

29 December 2015
Maggie Williams
Neighbourhood Planning Officer
Horsham District Council

Dear Maggie,

Subject: Pulborough Neighbourhood Plan 2015-2031, Regulation 16 Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the submission version of the Pulborough Neighbourhood Plan (NDP). The SDNPA welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community. We provided comments during the pre-submission consultations and are pleased to see the Pulborough NDP has been partially revised accordingly. In particular the SDNPA welcomes:

- The greater recognition that the NDP is partially within the South Downs National Park and gives useful reference to the emerging South Downs Local Plan at paragraph 2.17. However, paragraph 2.1 needs to be corrected to clarify that the SDNPA is the Local Planning Authority for part of the designated neighbourhood area. Paragraph 1.1 should also be corrected to state that part of the neighbourhood area was designated by the SDNPA.
- Revisions to Policy 6 & 7 which require sensitive external lighting at these allocated sites. This is in response to our previous comments on the potential impacts on the setting of the National Park and dark night skies.

We still consider some of our pre-submission comments to stand and therefore seek the following modifications:

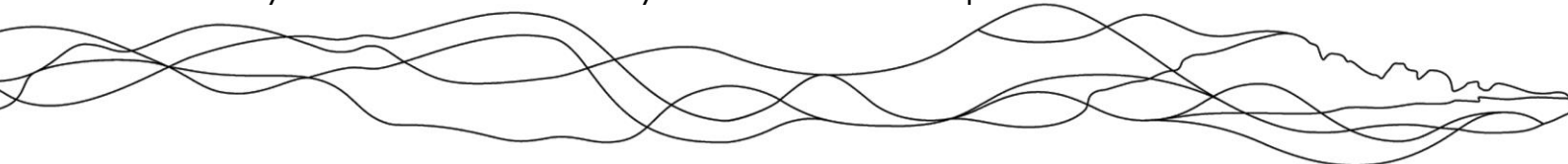
Policy 8 – Pulborough Garden Centre, Stopham Road

We welcome the revised wording of this policy, particularly the second paragraph which restricts ancillary café/restaurant uses to supporting the core garden centre business. However, the potential development area should be drawn much tighter to the existing built-up area of the Garden Centre to prevent encroachment into more open landscape within the National Park (see attached indicative map with recommended revised boundary). NPPF paragraph 115 states all proposals within the National Park must give great weight to conserving the landscape and scenic beauty. This should be better reflected in the 1st paragraph of the policy.

Policy 10 – Land off Stopham Road, Pulborough

We note that an additional allocation - Policy 10, has been included in the Submission NDP comprising a car park and land for approximately 28 dwellings at Land off Stopham Road. This allocation comprises land which was partially within the Built Up Area (BUA) boundary of Horsham District Planning Framework, but also involves an extension to the BUA boundary adjacent to the Stopham Road. While the redefined BUA boundary was shown in the pre-submission plan at Inset 2 no reference was made to this revision in Policy 1 in the Regulation 14 consultation.

We are concerned about the extension of the built-up area west of the railway line into the open countryside and closer to the boundary of the SDNP. The development of this land will lead to an



urbanising effect on the setting of the National Park; however, on balance we consider that a limited development does provide opportunities for substantial local benefit through the provision of greater station parking. This will address the problem of unmanaged parking on grass verges along Stopham Road and will in turn provide a safer and more attractive entry into the National Park.

The negative impacts of light pollution and urbanising infrastructure associated with a proposal at this site were highlighted in our response to a recent planning application on this site (DC/15/1025). Should this allocation be retained within the Pulborough NDP, we would expect to see clear requirements that any development must:

- be part of a comprehensive proposal to address the unmanaged parking on Stopham Road;
- improve the entrance to the village / National Park;
- minimise any impact on the setting of the National Park.

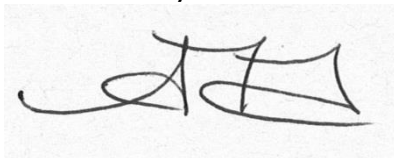
We would also expect that any external and street lighting satisfies the requirements set by the Institute of Lighting Professionals and other relevant standards or guidance. This is necessary to minimise the impact of any lighting upon wildlife and the dark night skies objectives of the South Downs National Park.

Strategic Environmental Assessment / Sustainability Appraisal

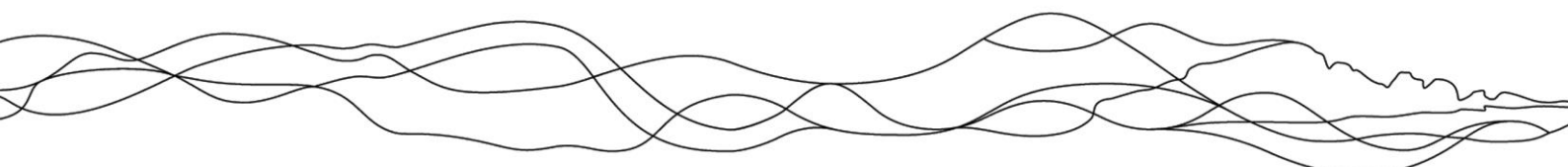
Our previous comments regarding the Mens SAC still stand. The emerging SDNP Local Plan HRA states that any development proposals within 7km of The Mens SAC (including windfall sites and sites not identified within the SDNPA Local Plan) have potential to result in likely significant effects upon the barbastelle bats of The Mens SAC via direct habitat loss or disturbances from lighting, noise and vibrations both during construction and operational phases of development. As Pulborough is within 7km of the Mens SAC, inclusion of additional policy or criteria within the Pulborough NDP is necessary to ensure suitable mitigation measures are undertaken including appropriate bat surveys and protection of key features and habitat. This modification is sought to ensure the Pulborough NDP has due regard to EU obligations including the protection of European protected habitats and species.

I have also attached our Regulation 14 response for you information.

Yours Sincerely

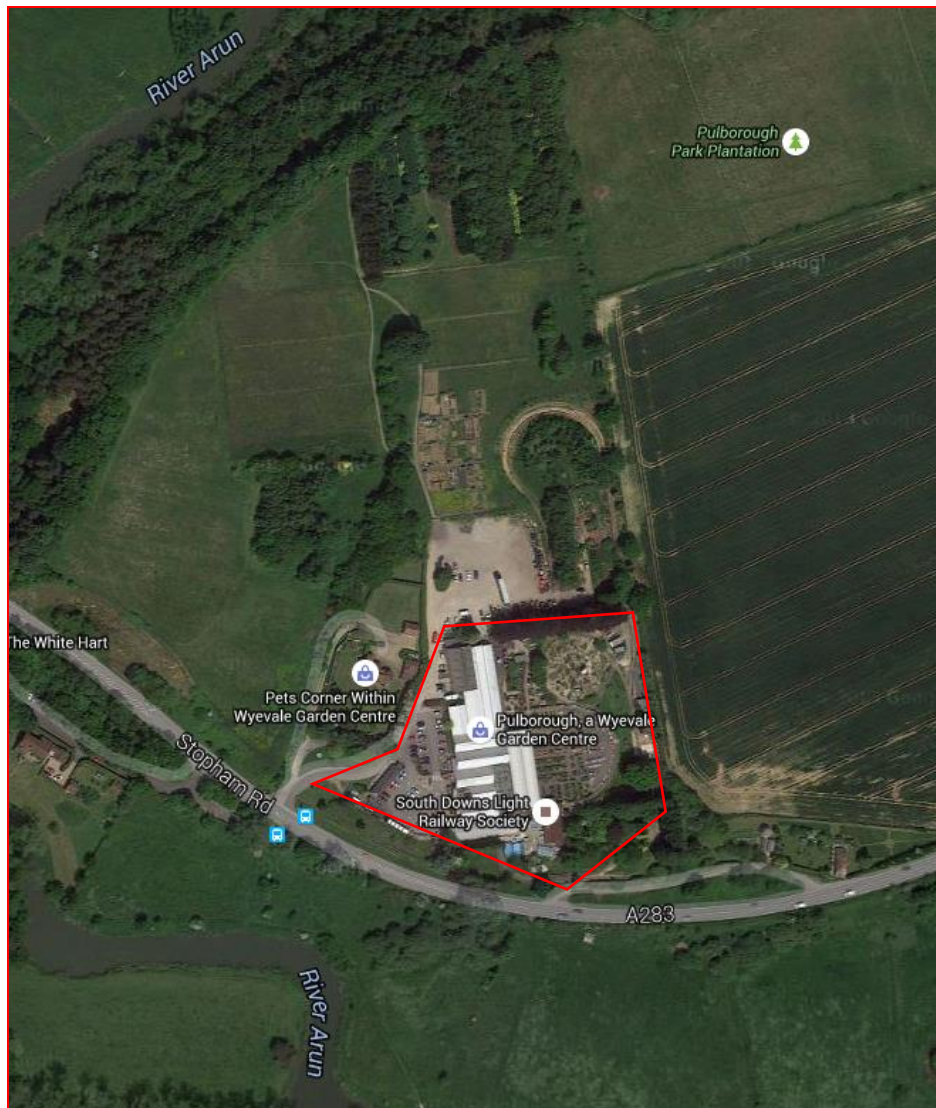


Amy Tyler-Jones
Neighbourhood Planning Officer
Amy.tyler-jones@southdowns.gov.uk
01730 819272



Pulborough Garden Centre, Stopham Road

Indicative map showing approximate recommended revised boundary



SDNPA comments on Pulborough NDP – Regulation 14 Consultation (July 2015)

Page no.	Section	Comments	SDNPA Recommendation
8	2. Planning policy context	<p>Planning policy context</p> <p>2.1 Should make clear that part of the Parish is in the South Downs National Park and that the SDNPA is the Local Planning Authority for this area. The two statutory purposes of the National Park should be upfront in this section as they are relevant to both land within the National Park and its setting:</p> <ol style="list-style-type: none"> 1. To conserve and enhance the natural beauty, wildlife and cultural heritage 2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public <p>It would also be helpful to make reference to the SDNPA National Park Partnership Management Plan 2014-2019 which is a material consideration in planning applications in the National Park.</p> <p>2.17 SDNPA will be consulting on the Local Plan – Preferred Options from the 2nd Sept to 28th Oct 2015.</p> <p>2.18 The draft SDNP Local Plan does not set any housing requirement for Pulborough as the settlement is outside the SDNP. However there are number of emerging policies which are relevant to parts of the Parish for example SD12 <i>Biodiversity & Geodiversity</i>, SD13 <i>International Sites</i>, SD18 <i>Transport and accessibility</i>, SD19 <i>Walking, Cycling and Equestrian Routes (includes safeguarded Pulborough-Petersfield disused railway)</i>, SD20</p>	<p>Include reference to SDNPA as Local Planning Authority for part of neighbourhood area.</p> <p>Includes details of National Park statutory Purposes.</p> <p>Make reference to SDNPA Partnership Management Plan.</p> <p>Update details on emerging SDNP Local plan.</p>

Page no.	Section	Comments	SDNPA Recommendation
		<i>Sustainable Tourism and SD51 Shops outside centres.</i>	
26	4. Vision, Objectives & Land Use Policies	<p>Policy 2 & 3</p> <p>The fourth criteria of both these policies require a landscape buffer. Landscape buffers are not a solution to poor design and should not be used to routinely screen new development where improved design which reflects local character would render this unnecessary. Where screening is necessary it should be consistent with the local landscape character in terms of hedgerow and woodland layout and pattern, as defined in relevant Landscape Character Assessments (for example the South Downs Integrated Landscape Assessment).</p>	Revise criteria on design and landscaping requirements.
28	Objectives & Land Use Policies	<p>Policy 6: Broomers Hill Industrial Estate</p> <p>This employment allocation should include provisions to protect the National Park setting. Development proposals at the site should conserve and where possible enhance the relative tranquillity in regards to lighting and dark night skies and ensure that future lighting avoids contributing to the level of background lighting emanating from this raised position.</p> <p>Established vegetation, hedgerows and trees should be conserved as they are likely to provide important wildlife corridors.</p> <p>See comments above regarding landscape buffers.</p>	<p>Include criteria in regards to lighting, dark night skies and conserving established vegetation, hedgerows and trees.</p> <p>Revise criteria on design and landscaping requirements.</p>
29	Objectives & Land Use	<p>Policy 7: Toat Café: Stane Street</p> <p>This allocation should include provisions to protect the National</p>	Include criteria in regards to lighting and dark night skies.

Page no.	Section	Comments	SDNPA Recommendation
	Policies	<p>Park setting. Albeit the distance from the National park, development proposals at the site could introduce lighting into an otherwise predominantly dark area adding to the level of background light particularly if it is a proposal for a hotel. Any proposal should conserve and where possible enhance the relative tranquillity in regards to lighting and dark night skies.</p> <p>See comments above regarding landscape buffers.</p>	Revise criteria on design and landscaping requirements.
29	Objectives & Land Use Policies	<p>Policy 8: Pulborough Garden Centre, Stopham Road Pulborough Garden Centre is in the National Park and the policy regarding its use and potential expansion should therefore be carefully worded to protect the special qualities of the National Park.</p> <p>Any intensification at the site should make use of existing buildings and avoid extending into the open countryside. The primary purpose of the garden centre should remain the sale of plants and garden related projects.</p> <p>Emerging SDNP Local Plan policy SD51 <i>Shops Outside Centres</i> sets criteria for development at Garden Centres in the National Park. Consideration should be given to these criteria in the drafting of this policy.</p>	Revise policy wording
30	Objectives & Land Use Policies	<p>Policy 11: Tourism Development We welcome this policy which seeks to improve visitor facilities at Pulborough Station. Pulborough is one of the gateway stations to the National Park identified in the</p>	Policy is welcome, recommend support is also given to measures which prioritise and improve pedestrian and cycle movement to and from the station and link into footpaths within the adjoining

Page no.	Section	Comments	SDNPA Recommendation
		<p>SDNPA Partnership Management Plan and proposals which enable enjoyment of the SDNP special qualities should be supported. It would be helpful if this policy also gave priority to movement by pedestrians and cyclists where appropriate.</p> <p>Emerging SDNP Local Plan policies SD18 & SD19 are relevant to this policy.</p>	<p>countryside. Improvements to signage for pedestrians and cyclists would also be helpful.</p>
32	Objectives & Land Use Policies	<p>Policy 14: Design</p> <p>This policy would benefit from being split into 2 or more separate policies on design. For example one policy could address access & boundary treatment.</p> <p>Criteria viii on infrastructure and services would work better as its own policy.</p> <p>Criteria ii should also include a provision to reflect the Local Landscape Character Assessment.</p> <p>It would be helpful to include a map of PRoWs in support of criteria vi.</p> <p>There appears to be overlap and repetition between criteria x & xvii.</p> <p>The final criteria on proposals in the setting of SDNP should conserve and where possible enhance relative tranquillity, in relation to light pollution and dark night skies</p>	<p>Revise policy, split into two or more policies.</p>
	SEA SA	<p>As a general comment, the Sustainability Report gives insufficient recognition to the location of parts of the Parish in the National Park and references to the policy context of the South Downs National Park</p>	<p>Include greater reference to South Downs National Park.</p> <p>Includes details of South Downs</p>

Page no.	Section	Comments	SDNPA Recommendation
		<p>Authority are missing.</p> <p>Non-technical summary - para. 3 should acknowledge that parts of the parish are in the National Park. In these areas, the 2007 Horsham Local Plan will in time be replaced by the South Downs National Park Local Plan. Reference should also be made to the National Parks Vision and Circular and the SDNP Partnership Management Plan. These comments also apply to para 3.1 of the main report.</p> <p>Para. 7 should also include details of the nearby Mens SAC. The SDNP Local Plan HRA states that any development proposals within 7km of The Mens SAC (including windfall sites and sites not identified within the SDNPA Local Plan) have potential to result in likely significant effects upon the barbastelle bats of The Mens SAC via direct habitat loss or disturbances from lighting, noise and vibrations both during construction and operational phases of development. As Pulborough is within 7km of the Mens SAC, inclusion of additional policy or criteria addressing the need to undertake surveys and protect key features and habitat is recommended.</p> <p>Para. 9 of the non-technical summary and para.7.1 is inaccurate, there are also relevant strategic policies in the emerging SDNP Local Plan.</p> <p>Para. 7.2 of the main report refers to the Garden Centre being in the setting of the National Park – this is incorrect, the Garden Centre is in the National Park.</p>	<p>National Park policy context.</p> <p>Include a policy in the neighbourhood plan or add to existing policy, requirement for bat survey and retention of key features such as foraging habitat and commuting routes as part of any appropriate application. The level and detail required will depend on the site and potential impact of the proposals.</p>

Page no.	Section	Comments	SDNPA Recommendation
		We are aware that HDC will also be commenting on the SA / SEA, we concur with the comments regarding assessment of reasonable alternatives and providing details of individual sites.	

