

07 October 2024

Planning Policy Team  
Horsham District Council

**SENT BY EMAIL**

Dear Sir/Madam,

**SDNPA response to Pulborough Neighbourhood Development Plan (NDP)  
[2015-2031] - Focused Consultation on Water Neutrality.**

Thank you for consulting the South Downs National Park Authority on the Pulborough NDP (Referendum Version). As we understand, the consultation is focused on the introduction of Policy 16 (Water Neutrality) and modifications to Policies 2, 3, 4, 5a, 5b, 6, 7, 8, 9 and 13.

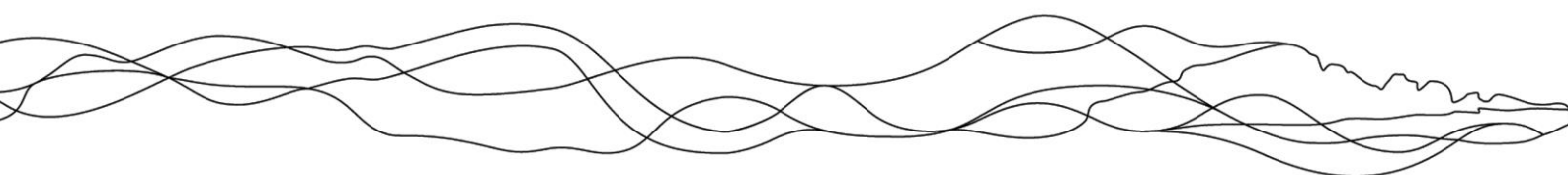
(1) Policies 2, 3, 4, 5a, 5b, 6, 7, 8, 9, and 13

The Authority raises no objection to the proposed modifications. Moreover, these policies have been modified in accordance with the Examiner's modifications as set out in their final report dated 18 September 2021. This includes the removal of references to Policy SD8 (Dark Night Skies) and Dark Skies Technical Advice Note (TAN) on the basis that the sites (excl. Policy 9 - Pulborough Garden Centre) are not in the National Park and, therefore, adopting the South Downs National Park Authority's standards is not justified. This is accepted and the matter is already covered by planning policies in the adopted and emerging Horsham Local Plan. Further to the above, the parish council has proposed to strengthen archaeological considerations (NDP Policies 2 and 3 only) and add a new criterion related to water neutrality as follows:

*"All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. All proposals should look to be compliant with the Horsham Strategic Policy 9: Water Neutrality with Horsham District Local Plan (2023-2040)."*

The Authority requests that a similar criterion is added to NDP Policy 9 (Pulborough Garden Centre, Stopham Road) as any development to intensify or extend the existing garden centre, and the facilities of its ancillary uses, will need to demonstrate water neutrality. It may be simpler to modify the last sentence of the new criterion to read:

*"All proposals should look to be compliant with the relevant strategic water neutrality policy in the Development Plan."*



## (2) Policy 16 – Water Neutrality

This new policy, and its supporting text, repeats Strategic Policy 9 (Water Neutrality) and Paragraphs 5.30 to 5.38 in the emerging Horsham Local Plan 2023-2040, including proposed modifications included as part of submission materials.

As set out in our response on 01 March 2024 to the Regulation 19 public consultation on the emerging Horsham Local Plan 2040:

*“We welcome and support the policy and introductory text which reflects ongoing joint working between all the affected local planning authorities. This is an important shared strategic cross boundary issue and South Downs National Park Authority will continue to work closely with Horsham and the other affected local planning authorities on this issue.”*

Water neutrality is a strategic cross-boundary issue. The National Planning Policy Framework (December 2023) makes it clear that local plans should include both strategic and non-strategic policies, whilst neighbourhood development plans should include non-strategic policies only – see Paragraphs 13 and 18, and Annex 2. The Authority is of view that the additional water neutrality criterion to allocation policies (see Section 1) is acceptable. However, in terms of new Policy 16, we note that the policy approach to this strategic cross boundary issue, including policy wording, is being addressed through the Local Plans and examinations of the affected local planning authorities.

Thank you very much for the opportunity to comment, and please do not hesitate to contact us if there are any issues, in relation to the above, that you would like to discuss or seek clarification on.

Yours sincerely



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