

28 July 2020

SENT BY EMAIL
Ms Heather Knight
Pulborough Parish Council
Swan View
Lower Street
Pulborough
West Sussex
RH20 2BF

Dear Heather,

SDNPA response to Pulborough Pre Submission (Regulation 14) Neighbourhood Development Plan

Please find attached the SDNPA response to the Regulation 14 consultation on the Pulborough Neighbourhood Development Plan.

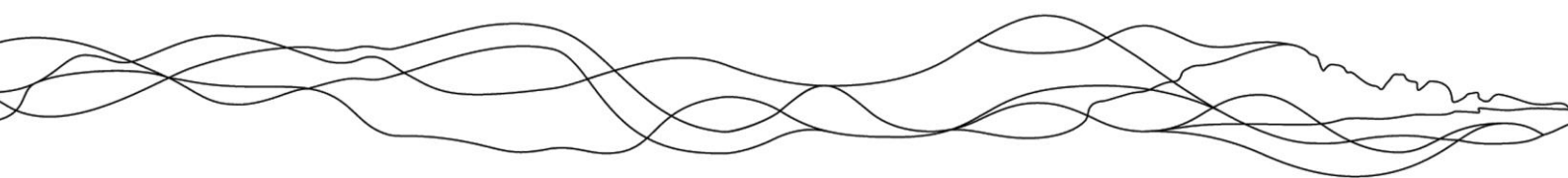
SDNPA congratulates Pulborough Parish Council on having prepared a robust and locally distinctive plan for their community. The Pulborough Neighbourhood Development Plan (PNDP) has been developed over a relatively long period of time reflecting the challenge of preparing Neighbourhood Plans in split parishes, with more than one Planning Authority and more than one Development Plan.

The comments are not matters which relate to the basic conditions for the purposes of a successful examination of a Neighbourhood Development Plan. However, the comments do identify opportunities to make improvements to the Pulborough Neighbourhood Development Plan.

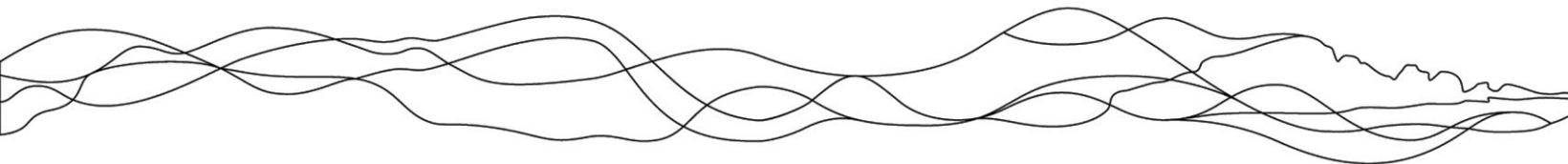
Please contact me if there are any issues in relation to the response you would like to discuss.

Kind Regards

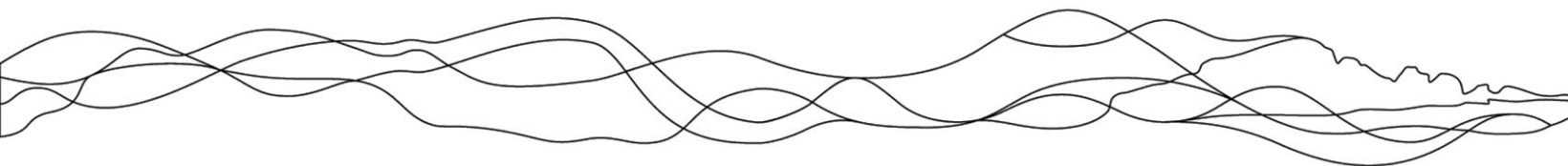
Chris Paterson
Communities Lead
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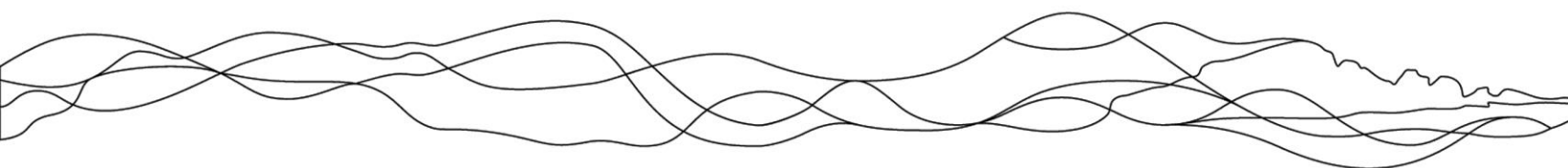
Ref	Comment	SDNPA Recommendation to Pulborough Parish Council
General Neighbourhood Development Plan		
General Comments	A significant part of the South Downs National Park (SDNP) lies within Pulborough Neighbourhood Area. We welcome the mention of the importance of the National Park to the village and the mention of conformity of the adopted South Downs Local Plan.	N/A
1. Introduction and background		
1.1	Part of the Neighbourhood Area falls within the National Park and was designated for the purposes of Neighbourhood Planning by the SDNPA on 17 February 2014; this designation by the Authority should be referenced here alongside the designation by Horsham District Council.	Update text to refer to designation of SDNP part of Pulborough Neighbourhood Area
2. Planning policy context		
2.1	<p>As this is an introductory paragraph to set out the Planning Policy context it would be helpful to reference the South Downs Local Plan (SDLP). The SDLP is referenced later at paragraph 2.16, but a reference in the introduction to this section would make it clear that the SDLP applies to the part of the Parish falling in the National Park.</p> <p>It would also be useful in this section to include reference to the National Park's Purposes and Duty, and how these purposes should also be considered by other relevant authorities. Suggested text is provided.</p>	<p>Update text to refer to South Downs National Park Authority being the Local Planning Authority for part of the parish.</p> <p>Consider including additional text to clarify the role of the National Park Authority and its purposes and duty.</p> <p>The National Park purposes are:</p>



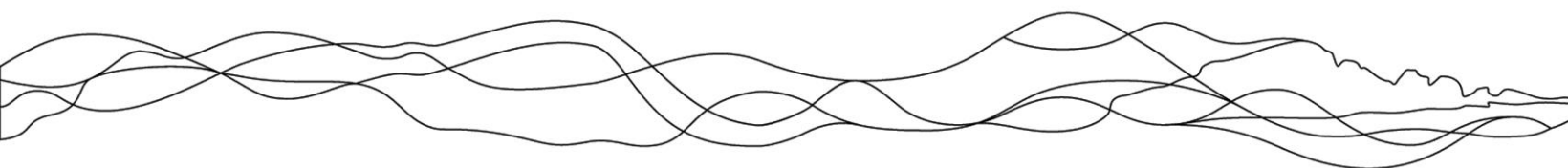
		<p>To conserve and enhance the natural beauty, wildlife and cultural heritage of the area</p> <p>To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public</p> <p>The National Park Authority also has a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park</p> <p>In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires The Sandford Principle to be applied and the first purpose of the National Park will be given priority.</p>
2.16	The paragraph currently refers to the submission and subsequent adoption of the SDLP, this paragraph could be updated to refer to the adoption of the SDLP by the National Park Authority in July 2019 following a successful examination.	Update text to refer to the adopted status of the SDLP
2.17	This paragraph should be amended to correctly reflect the spatial strategy of the SDLP. The SDLP identified an appropriate provision of housing development for settlements within the National Park only. Where settlements such as Pulborough, fall outside the National Park it was not appropriate to provide a housing figure.	Update text to make reference to the position of Pulborough settlement falling outside the National Park, therefore any provision of housing to be met within the settlement policy boundary would be set by the Horsham District Local Plan.
4. Vision and Objectives		



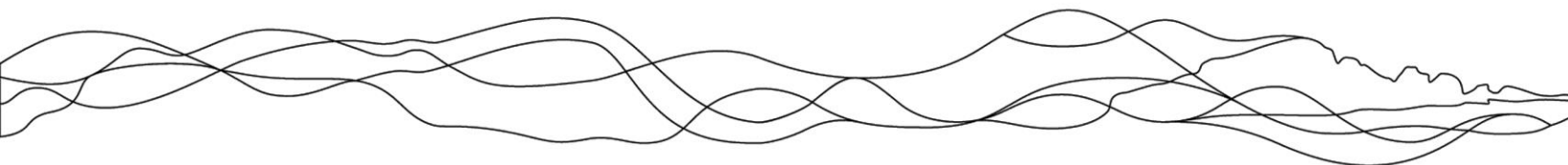
4.1 (Objectives)	It may be helpful to update the first objective which seeks to conserve the landscape, scenic beauty and views of the South Downs National Park and other surrounding countryside to reflect the first purpose of the National Park which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area	Consider an amendment to the first objective to reflect the purposes of the National Park
4.4	Reference to the SDLP should be included as the development plan for the part of the parish within the National Park	Update text to make reference to the SDLP
Land Allocation policies - General		
	A number of the draft housing allocations are close to the boundary of the National Park. It may be appropriate to include a policy criterion supporting footpath and cycle links to the surrounding countryside, in particular the South Downs National Park. This will be particularly relevant where there is an opportunity to link to the safeguarded Midhurst to Pulborough non-motorised travel route. There is an example of this type of policy wording at Policy 7, criterion iii.	Consider including policy criterion in residential land allocations for pedestrian and cycle connections to the South Downs National Park
Policy 2. Land at New Place Farm, Pulborough		
	The South Downs National Park Authority (SDNPA) welcome reference to the importance of wider landscape impact. However, this is a significant housing allocation, with the potential to impact the setting of the National Park and important views to and from the National Park. The SDNPA request specific reference to the consideration of the impact of development on the setting of the National Park. In particular views to and from the National Park should be referenced in the policy. Specific policy wording can be drawn from Policy SD6: Safeguarding views of the SDLP. The site will require careful	The policy should make specific reference to conserving and enhancing the landscape character of the National Park. Incorporate specific reference to conserving and enhancing key views and views of key landmarks within the National Park.



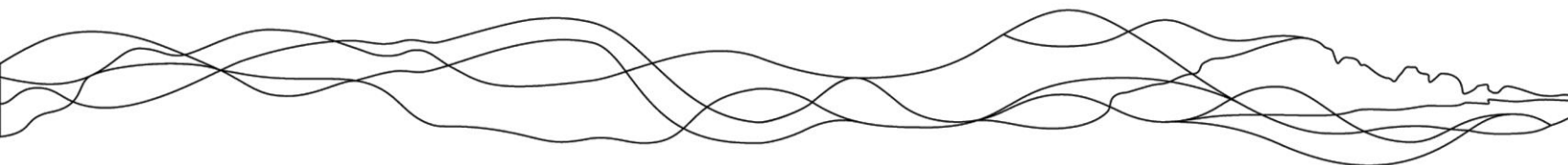
	planning to ensure the local landscape character is not harmed, and any development sits well in the surrounding landscape.	
Policy 2. x	The South Downs National Park is designated as a Dark Sky Reserve, this should be reflected in policy wording and supporting text. It would be helpful to make reference to the SDNPA Technical Advice Note on Dark Night Skies, this reference could be included in the policy wording at this particular policy clause. Further description and signposting to the Technical Advice note could be included in supporting text at paragraph 4.12	Include reference to the SDNPA Technical Advice Note for Dark Skies which can be found here https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf
Policy 3: Land off Glebelands, Pulborough		
Policy 3. ii	It is not clear what proportion of affordable housing will be required on this site. Other policies make reference to the need to deliver affordable homes in accordance with identified need and the policies in the development plan, is that the intention of this policy?	Clarify the affordable housing requirement for this draft allocation
Policy 3. v	The South Downs National Park is designated as a Dark Sky Reserve, this should be reflected in policy wording and supporting text. It would be helpful to make reference to the SDNPA Technical Advice Note on Dark Night Skies, this reference could be included in the policy wording at this particular policy clause. Further description and signposting to the Technical Advice note could be included in supporting text at paragraph 4.13	Include reference to the SDNPA Technical Advice Note for Dark Skies which can be found here https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf
Policy 3. vii	Given the close proximity of this draft allocation to the National Park boundary, and its position on the edge of the settlement specific reference to the impact of development on the setting of the National Park should be included. In particular views to and from the National Park should be referenced in the policy. Specific policy wording can be drawn from Policy SD6: Safeguarding views of the SDLP	Include reference to the proximity of the National Park boundary and the importance of considering the impact of any development on the setting of the National Park.
Policy 4: Land off Station Approach, Pulborough (PPNP05)		



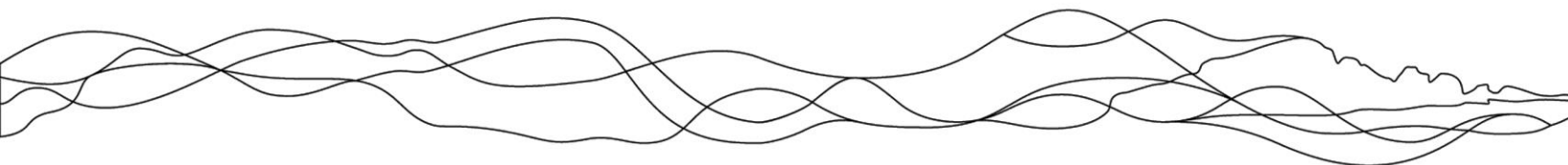
Policy 4. iv	Is it possible to incorporate provision of parking to serve the station as this is identified as a specific issue by the Neighbourhood Plan and reflected in the Neighbourhood Plan objectives.	Consider whether there is capacity for parking provision to serve the Railway station.
Policy 7: Broomers Hill Industrial Estate, Codmore Hill (PPNP24)		
Policy 7. x	The South Downs National Park is designated as a Dark Sky Reserve, this should be reflected in policy wording and supporting text. It would be helpful to make reference to the SDNPA Technical Advice Note on Dark Night Skies, this reference could be included in the policy wording at this particular policy clause. Further description and signposting to the Technical Advice note could be included in supporting text.	Include reference to the SDNPA Technical Advice Note for Dark Skies which can be found here https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf
Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough (PPNP27)		
Policy 8	This site is detached from the existing settlement boundary and consideration should be given to whether it is appropriate to allocate a site in open countryside. Consideration should also be given as to how this policy conforms with Policy 1 of the Pulborough Neighbourhood Plan and Policy 26 of the Horsham District Planning Framework	Consider whether a land allocation for redevelopment is appropriate in this open countryside location.
Policy 8. iii	The South Downs National Park is designated as a Dark Sky Reserve, this should be reflected in policy wording and supporting text. It would be helpful to make reference to the SDNPA Technical Advice Note on Dark Night Skies, this reference could be included in the policy wording at this particular policy clause. Further description and signposting to the Technical Advice note could be included in supporting text.	Include reference to the SDNPA Technical Advice Note for Dark Skies which can be found here https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf
Policy 9: Pulborough Garden Centre, Stopham Road (PPNP16)		
General	It is difficult to comment specifically on this policy as it is not shown on the policies map, therefore it is not possible to fully understand the implications of allowing the extension or intensification of the site. Any extension or intensification of the site would need to take into account the sensitive natures	The site allocation should be included on the policies map Policy wording should be added to make reference to the importance of conserving and



	<p>of the surrounding landscape. Reference should be made to conserving and enhancing the landscape character of the National Park in any development proposals. There should also be reference to the South Downs Dark Night Skies policy and supporting technical advice note.</p> <p>The SDNPA support the proposal to retain existing employment provision in the National Park.</p>	<p>enhancing the landscape character of the National Park.</p> <p>Policy wording should include reference to policies of the South Downs Local Plan, this reference could usefully be added in the policy and supporting text.</p>
Policy 9. i	<p>The SDNPA welcome policy criterion i which seeks to conserve the special landscape and scenic beauty of the South Downs National Park. However, it would be appropriate to refer to the requirement to have regard to the purposes of the South Downs National Park, in particular to conserve and enhance the natural beauty, wildlife and cultural heritage of the South Downs National Park.</p>	<p>Make specific reference to conserve and enhance the natural beauty, wildlife and cultural heritage of the South Downs National Park.</p>
Policy 9iii	<p>It is unclear what this policy clause is seeking to achieve, if there is a current issue relating to hours of use this would need to be considered outside planning policy, and an attempt to seek to influence hours of operation may not be appropriate for a Neighbourhood Plan policy.</p>	<p>Provide clear explanation of the intention of this policy clause in supporting text</p>
Policy 10: Multi-Purpose Community & Sports Centre, Pulborough		
	<p>It is difficult to comment specifically on this policy as it is not shown on the policies map, therefore it is not possible to fully understand the implications of improvements or extensions to the existing facility.</p>	<p>The site allocation should be included on the policies map</p>
Policy 12: Tourism Development		
	<p>The SDNPA welcome a policy which seeks to support the development of new tourism facilities, particularly where they have regard to the conserving the special landscape of the National Park.</p> <p>It is not clear from the current policy wording what form of tourism facilities the policy is seeking to encourage, is this visitor attractions or visitor accommodation? The Neighbourhood Plan has an objective to strengthen the</p>	<p>Clarify what type of tourism facilities the policy is seeking to support</p>



	<p>visitor economy, therefore this policy needs to be clear about how it will support that objective.</p> <p>The SDNPA would support reference to the development of sustainable tourism facilities, facilities which are located closely to the public rights of way network and can support the visitor economy without relying on private car travel for example. This desire for sustainable tourism is clear in the supporting text at paragraph 4.29, it may be appropriate to include policy clause to encourage the development of tourism facilities in this location. This is particularly relevant given the close proximity of the safeguarded Midhurst to Pulborough route which will enable those arriving on the train to travel without car further into the National Park.</p>	<p>Consider modifications to policy wording to encourage the development of sustainable tourism facilities</p>
Policy 13: Community Facilities		
	<p>The policy as currently drafted supports the redevelopment or improvement of existing community facilities. However, the Neighbourhood Plan objectives seek to protect and provide additional community facilities. The policy should be redrafted to resist the loss of community facilities and allow for the extension of existing facilities. Alternatively, an additional policy could be included to protect existing community facilities.</p>	<p>Consider additional wording to ensure the policy safeguards existing community facilities</p>
Policy 15: Design		
	<p>The first two paragraphs of the policy should be moved to supporting text as they provide the context and justification for the policy, they could not be applied in the determination of a planning application.</p> <p>The policy makes a number of references to the Pulborough Village Design Statement, it would be useful to state in supporting text what weight this carries in the planning system. Has the Parish Council considered developing a design code as part of the Neighbourhood Plan process to set out in more detail a set of design guidelines within the neighbourhood plan?</p>	<p>Move first two paragraphs of the policy to supporting text.</p> <p>Clarify the status of the Pulborough Village Design Statement and consider whether a design code would be appropriate for the Pulborough Neighbourhood Plan</p>



Policies Maps		
	The policies maps include the boundary of the South Downs National Park, but there is no reference to this feature on the key. It would be helpful for the reader if the feature was included on the key and where possible be made clearer on the policies maps.	Include reference to the South Downs National Park on policies maps key
	Policy I defines the Built up Area Boundary for Pulborough, and reference is made to the Built up Area Boundary as shown on the policies map, however, the Built-up Area Boundary does not appear on any of the policy maps.	The Built-up Area Boundary should be included on the policies map

