

13 January 2021

SENT BY EMAIL

Mr Norman Kwan  
Horsham District Council  
Parkside  
Chart Way  
Horsham  
West Sussex  
RH12 1RL

Dear Mr Kwan,

**SDNPA response to Pulborough Submission (Regulation 16) Neighbourhood Development Plan**

Please find attached the SDNPA response to the Regulation 16 consultation on the Pulborough Neighbourhood Development Plan.

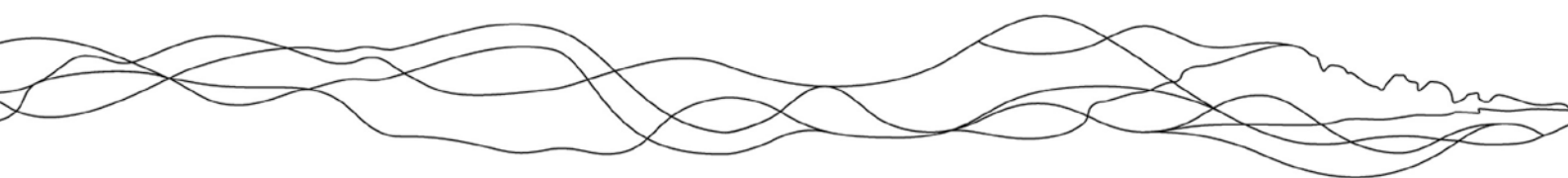
SDNPA congratulates Pulborough Parish Council on having prepared a robust and locally distinctive plan for their community. The Pulborough Neighbourhood Development Plan (PNDP) has been developed over a relatively long period of time reflecting the challenge of preparing Neighbourhood Plans in split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

The comments are not matters which all 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

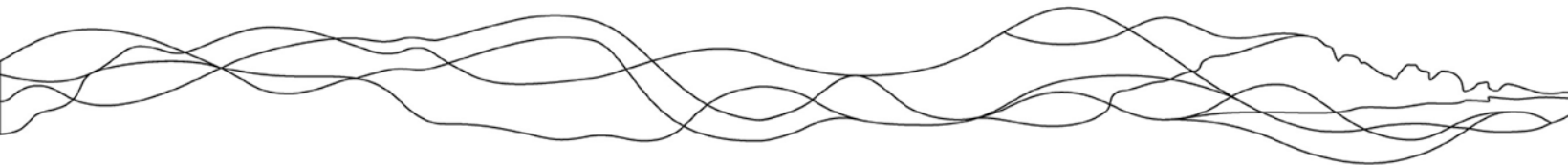
Chris Paterson  
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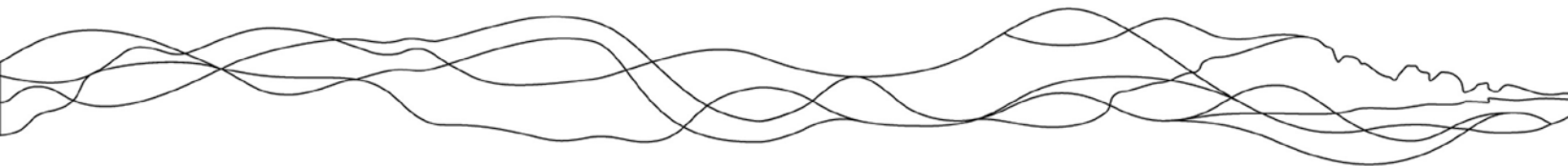
## SDNPA response to the Pulborough Pre-Submission Neighbourhood Development Plan

13/01/2021

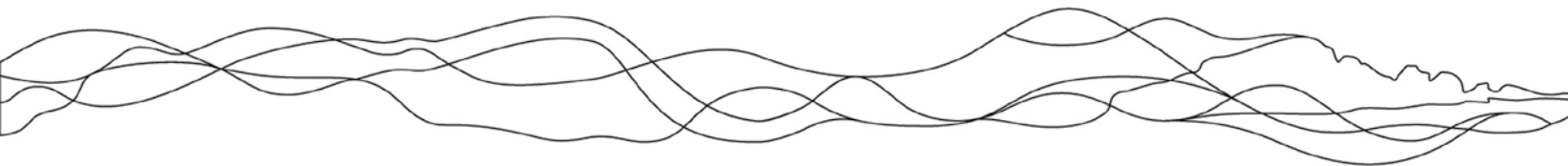
Ref	Comment	SDNPA Recommendation to Pulborough Parish Council
<b>General Neighbourhood Development Plan</b>		
General Comments	A significant part of the South Downs National Park (SDNP) lies within Pulborough Neighbourhood Area. We welcome the mention of the importance of the National Park to the village and the mention of conformity of the adopted South Downs Local Plan (SDLP).	N/A
<b>1. Planning policy context</b>		
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. This is an important aspect to highlight, demonstrating that there is not housing provision set for Pulborough by the SDNPA	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.
<b>4. Vision and Objectives</b>		
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, this statement could include reference to the importance placed on views of the South Downs National Park from the Parish.
<b>Policy 1: A Spatial Plan for the Parish</b>		



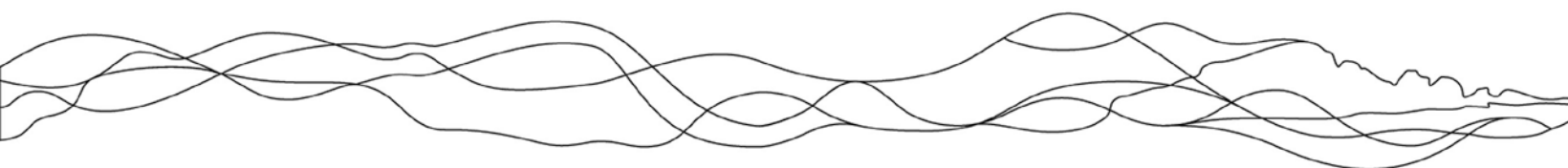
	The policy states that the Neighbourhood Plan defines a Built up Area Boundary (BUAB) for Pulborough as shown on the Horsham District Planning Framework Policies map. However, the supporting text goes on to state that the BUAB has been amended to incorporate the two housing allocations proposed in the PPNP. To ensure clarity for the reader it would be better for the policy to refer to the amended BUAB, and reference a map within the PPNP which clearly shows the BUAB	Consider minor policy wording review to ensure reference to the updated BUAB is included in the policy, not just supporting text. Reference should be to the most up to date BUAB
<b>Policy 2. Land at New Place Farm, Pulborough</b>		
Policy 2. xiii	The provision of a county park in the development proposal is to be welcomed. It would be useful to make reference to the importance of connecting to existing green infrastructure in the vicinity of the allocation. The importance of connecting exiting habitats to the country park should be highlighted in the supporting text	Reference to the importance of connecting the new country park to existing green infrastructure in proximity to the site to ensure opportunities to connect existing habitats is not lost
<b>Policy 3: Land off Glebelands, Pulborough</b>		
Policy 3. i	The requirement for the site to come forward as a CLT proposal is supported. The requirement for self-build provision on the site is presented as an option, if there is an ambition to deliver self-build homes in the parish this requirement could be strengthened in the policy wording	Consider minor policy word change to ensure self-build housing is part of the development proposal.
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? If there is to be an element of the allocation come forward as Self Build housing, this may need to be considered in relation to the provision of Affordable Housing	Clarify the affordable housing requirement for this draft allocation
<b>Policy 4: Land off Station Approach, Pulborough (PPNP05)</b>		
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	Consider whether there is capacity for parking provision to serve the Railway station.



	Neighbourhood Plan objectives.	
<b>Policy 8: Land formerly known as the Toat Café, Stane Street, Pulborough (PPNP27)</b>		
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. This is a key site as an entrance to the village and SDNP, therefore any redevelopment should consider carefully the impact on the landscape setting	Consider whether a land allocation for redevelopment is appropriate in this open countryside location. Sensitive development should be encouraged in this gateway location
<b>Policy 9: Pulborough Garden Centre, Stopham Road (PPNP16)</b>		
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 nature 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.  The SDNPA support the proposal to retain existing employment provision in the National Park.	The site allocation should be included on the policies map Policy wording should be added to make reference to the importance of conserving and enhancing the landscape character of the National Park. 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.
<b>Policy 10: Multi-Purpose Community &amp; Sports Centre, Pulborough</b>		
	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.	The site allocation should be included on the policies map
<b>Policy 12: Tourism Development</b>		
	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. It is not clear from the current policy wording what form of tourism facilities the	Clarify what type of tourism facilities the



	<p>policy is seeking to encourage, is this visitor attractions or visitor accommodation? The Neighbourhood Plan has an objective to strengthen the 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>policy is seeking to support</p> <p>Consider modifications to policy wording to encourage the development of sustainable tourism facilities</p>
<b>Policy 13: Community Facilities</b>		
	<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>
<b>Policy 15: Design</b>		
	<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>Clarify the status of the Pulborough Village Design Statement and consider whether a design code would be appropriate for the Pulborough Neighbourhood Plan. Alternatively the group could consider updating the design statement to provide further detail to support this policy</p>
<b>Policy 16. Cycleways</b>		



	<p>The SDNPA support the intention of this policy, and support the NPSG aspiration to create separate cycle and pedestrian routes, and this supports current Government guidance to create separate routes for pedestrians and cyclists. However, as currently drafted this policy is not considered to relate to development and therefore is not considered appropriate for a planning policy. This community aspiration would be better presented as a community aim to be progressed through a partnership approach with the Highways Authority and Parish Council</p>	<p>This policy should be presented as a community aim in section 5 and clearly distinguished from planning policy in the PPNP</p>
<b>Policies Maps</b>		
	<p>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.</p>	<p>Include reference to the South Downs National Park on policies maps key</p>
	<p>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.</p>	<p>The Built-up Area Boundary should be included on the policies map</p>

