

## **PULBOROUGH PARISH NEIGHBOURHOOD PLAN**

### **REGULATION 14 REPORT: OCTOBER 2020**

#### **Purpose**

1. The purpose of this report is to summarise the outcome of the consultation period on the Pre-Submission Pulborough Parish Neighbourhood Plan (PPNP) held from 6<sup>th</sup> July to 31<sup>st</sup> August 2020. The report makes some recommendations on how the PPNP should proceed in the light of representations made. All policy numbers referred to in this report relate to the Pre-Submission Plan unless indicated otherwise.

2. The report will be published by Pulborough Parish Council (PPC) and it will be appended to the Consultation Statement that will accompany the submitted PPNP in due course, in line with the Neighbourhood Planning (General) Regulations 2012.

3. During the consultation period there were many representations made by local people, by the statutory consultees, developers/landowners and by other local and interested organisations. The responses from the local community have been reviewed and analysed by the PPNP Steering Group and its summary of those responses is reported separately.

4. This report therefore summarises those representations made by the statutory consultees, developers/landowners and other interested organisations in relation to the extent to which the proposed land use policies meet the basic conditions as required by the Neighbourhood Planning (General) Regulations 2012. Details of the full representations made will be included in the Consultation Statement in due course.

#### **Consultation Analysis**

5. The two local planning authorities – Horsham District Council (HDC) and South Downs National Park Authority (SDNPA) – have provided officer comments. As the majority of land is within the HDC area, HDC has formally taken the role as the leading authority to adopt the PPNP if made. Therefore, the PPC has mainly been in regular dialogue with HDC during the preparation of the PPNP. However, the SDNPA has also been consulted where necessary, and has been the prime point of contact under contract to HDC for the preparation of the Regulation 14 response analysis, and preparation of the Regulation 15 document. Both authorities have raised issues on some of the proposed policies and have made a number of suggestions on how the final document may be improved.

6. HDC has made several suggestions for minor reworking of the pre-submission plan, and these have now been incorporated

7. The SDNPA issues relate to:

- Policy 2 Land at New Place Farm, Pulborough – revise criteria and add landscape buffer as fourth criteria
- Policy 3 Land off Glebelands, Pulborough – revise criteria and add landscape buffer as fourth criteria
- Policy 6 Broomers Hill Industrial Estate – revise criteria and include consideration of lighting, dark night skies and conserving established vegetation, hedgerows and trees
- Policy 7 Toat Café, Stane Street - revise criteria on design and landscaping requirements and include consideration of lighting, and dark night skies
- Policy 8 Pulborough Garden Centre, Stopham Road – revise policy wording to consider the emerging SDNP Local Plan policy SD51 Shops Outside Centres
- Policy 11 Tourism Development – suggests inclusion of pedestrian and cyclist access and improved signage to this policy
- Policy 14 Design – suggest dividing the policy into two or more, separating access and boundary treatment and infrastructure and services separately. Criteria ii to include provision to reflect the local Landscape Character Assessment. Suggests including map of PRoW to reference vi. Duplication of criteria x and xvii. The final criteria xxiii. Should also conserve and enhance relative tranquillity in relation to light pollution and dark skies
- Draft SA/SEA – add greater reference to the SDNP, details of its policy context and reference its policies. More generally, add reference to the Mens SAC in para 7. Paras 9 and 7.1 and 7.2 (Garden Centre in the setting of the SDNP) inaccurate

8. West Sussex County Council submitted a general response but made several comments regarding upgrading footpaths to be bridleways, hence allowing bicycles access on these paths. The Submission Neighbourhood Plan has been amended to incorporate many of these in a new policy 16 on cycleways, but permission will be needed from any landowners whose property has existing footpaths running across them for any changes to be made. These requests will be investigated when the Neighbourhood Plan has received approval in the public vote.

9. Historic England has emphasised the need for assessments of sites of known historic interest. The NP has been amended to explicitly reference that need where appropriate.

10. Comments regarding tourism have resulted in the pre-submission plan being amended to include 3 new proposed cycle routes and also taking full advantage of free access to the river near Swan Bridge for water sports.

11. The pre-submission plan has made efforts to include protection of the parish conservation areas, as defined and enlarged in the HDC report of January 2018

12. The Environment Agency had particular concerns regarding water quality, and a letter has been written to them by the NPSG highlighting concerns along the boundary of the village centre and Pulborough Brooks.

13. Southern Water has raised no objections to the PPNP.

14. The Diocese of Chichester is the owner of land at West Glebe Field and East Glebe Field. It has objected to the sites being identified as Local Green Spaces in Policy 13 of the PPNP and would like its site at West Glebe to be considered as an allocation for future development comprising housing development of a number of dwellings together with car parking and a churchyard extension, It also has objections in regards to Policy 10 West Glebe, Pulborough where the land has been identified for extension of the graveyard and introduction of a public footpath, although it has stressed that the footpath is done at its discretion.

16. Representations have also been made by LRM Planning Ltd on behalf of the land-owner W.T. Lamb Holding Ltd in respect of the land at Broomers Hill Business Park allocated for further business uses in Policy 6 Broomers Hill Industrial Estate, Codmore Hill. The response shows support towards the PPNP in general and in particular Policy 6. The landowner has however suggested some amendments that would help to facilitate the scheme.

17. Savills has responded on behalf of the landowners, Family Duncan of Land at New Place Farm in Policy 2. They have undertaken an assessment of road access with West Sussex Highways, who have shown that roads in the area have ample capacity to take the phase 1 development on the South of this site.

### **Modifying the Submission Plan**

18. The comments made by the statutory consultees confirm that the PPNP meets the 'basic conditions' of making neighbourhood plans, though some further clarity and minor amendments to the submission version of the Plan and the SA/SEA will be helpful.

19. The comments made by the South Downs National Park Authority and Historic England are welcomed and some minor changes have been made to the plan where relevant.

20. Importantly, the owners of the proposed housing allocations in policies 2 and 3 have supported the policies in principle, albeit with some further clarification sought on the details. In addition, the planning authorities have not objected to the scale of housing development proposed in the Plan nor to the spatial plan of Policy 1 focusing on Pulborough village and the two sites proposed for allocation. There is therefore no requirement for the Plan to consider additional sites in Pulborough village or to reconsider the exclusion of Codmore Hill in its spatial plan to meet the basic conditions. The Plan makes it clear that should a future review of district housing need require additional housing in this area, then the Plan may be reviewed to plan for that circumstance in future iterations.

20. The objections of other landowners/developers are not considered of sufficient significance to require a review of the spatial plan of the PPNP. The sites selected are considered to represent a sustainable means of distributing

housing development. The sites chosen reflected the Steering Group's planning judgement of the technical merits of the assessment and the local community's views in the engagement activities. In addition, each allocation policy, using the SA/SEA analysis, has sought to identify the appropriate mitigation measures as policy requirements to guide future planning applications.

21. Finally, in respect of the response from the Diocese, it is not considered necessary to reconsider the designation of the East Glebe as a Local Green Space as the land is considered as meeting the criteria of the NPPF. The proposed designation of West Glebe will not allow for any buildings, either with a community purpose or any other, as the designation has the effect of Green Belt status. The land is also outside the defined Settlement Boundary and within the recently augmented Conservation Area, making any such proposal highly unlikely to be acceptable in policy terms. However, the designation would still allow for the use of part of the land for a new footpath and extension to the cemetery, as such proposals are unlikely to undermine the essential open character of the land that warrants its designation.

22. There were a significant number of comments from residents on three aspects of the pre-submission plan.

a) Residents bordering sites covered in policies 2 and 3, (New Place Nurseries and land east of Glebelands) objected to development in these areas, despite an independent view from West Sussex Highways showing there was capacity in the pre-submission plan to take traffic from the Phase 1 development, and from the land East of Glebelands. Policies 2 and 3 therefore remain unchanged.

b) A number of representations were received concerning all aspects of the West Glebe Field. These comments were balanced fairly evenly between those supporting the pre-submission plan, and those opposing it. As a result, together with concern for the village conservation area, policy 11 remains unchanged.

c) Around 1/8<sup>th</sup> of the responses stressed the need for rental accommodation for workers earning less than the local median wage (below £25000 pa). Although the Neighbourhood Plan cannot address these concerns in any policy, the Community Aims section has been amended to reflect a stronger desire for such accommodation in the village.

## **Recommendations**

23. It is recommended that:

- The policies and supporting text are changed with only minor modifications as described above
- There are no other sites allocated
- The PPNP is finalised for submission for examination, subject to the completion of its Basic Conditions Statement and Consultation Statement