

PULBOROUGH PARISH NEIGHBOURHOOD PLAN 2015 - 2031

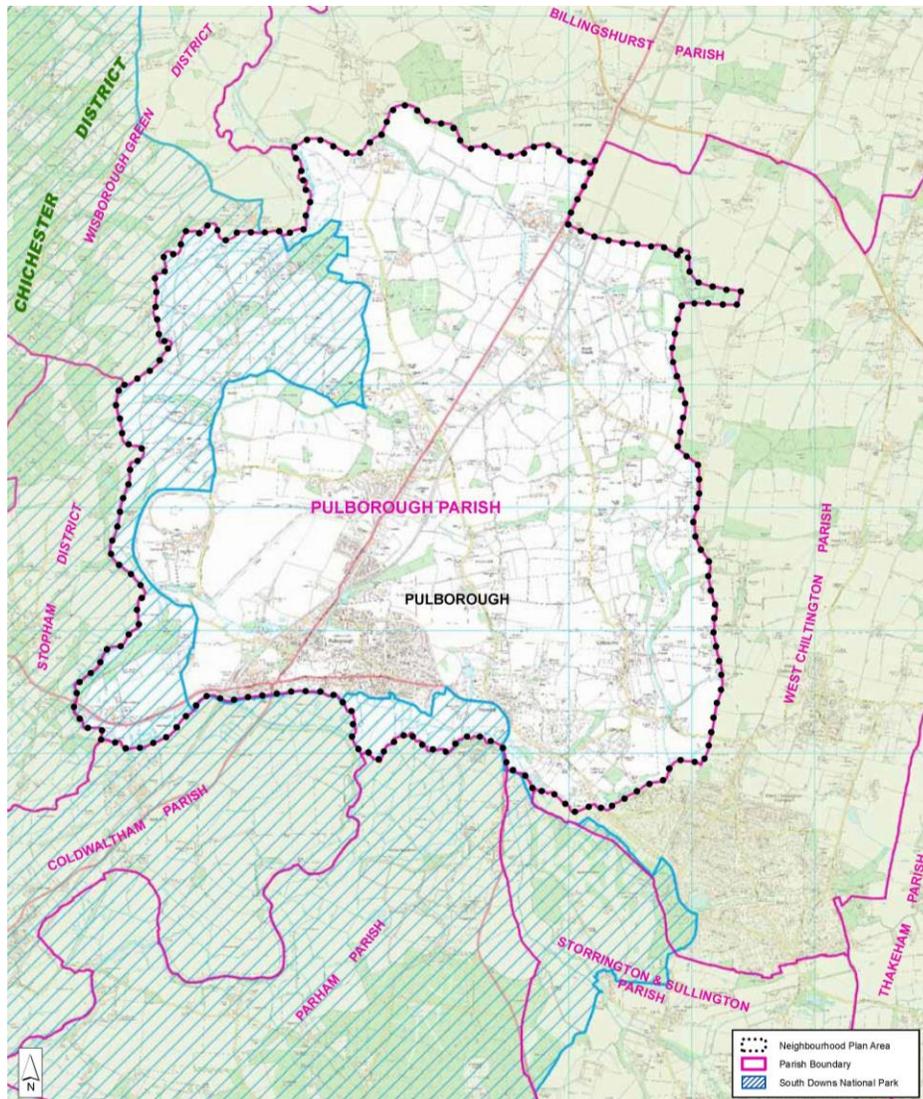
CONSULTATION STATEMENT



Consultation Statement Pulborough Parish Neighbourhood Plan (PPNP) 2015 to 2031

Published by Pulborough Parish Council to comply with the Neighbourhood Planning Regulations 2012 (Section 15(2) Part 5)

This application relates to Pulborough Parish Council, designated boundary as indicated on the plan below.



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**Pulborough Parish Neighbourhood Plan
Steering Group Membership as at October 2020**

Chairman	Andy Tilbrook	Local Resident
Members	David Hurst	Pulborough Community Partnership
	Martin Ellis	Pulborough Society
	Edna Henly	Pulborough Parish Council
	Ray Quested	Local Resident

Introduction

This Consultation Statement supports the Submission Neighbourhood Plan and Sustainability Appraisal/Strategic Environmental Assessment in accordance with the Community Engagement Statement and Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

An extensive level of consultation (community and statutory) has been undertaken by the steering group, focus groups and Parish Council as required by the legislation. This document will set out the following :-

- People and organisations who have been consulted
- How they were consulted
- The main issues and concerns raised through the consultation
- How these issues and concerns have been considered and addressed in the proposed Neighbourhood Plan.

Guidance from the Department for Communities and Local Government (10 Sept 2013) states that :

"the consultation statements submitted with the draft Neighbourhood Plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals".

Background

The PPNP is the culmination of 7 years' work by the Pulborough Neighbourhood Plan Steering Group, initiated by the Parish Council and led by the community.

The Parish Council has represented the views of residents over the years by responding to consultations from the district and county councils in the light of influencing local plan policies and infrastructural development proposals to benefit the parish and its residents.

Planning must not determine the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be. In too many places this approach writes off rural communities in a 'sustainability trap' where development can only occur in places already considered to be in narrow terms 'sustainable'. The question planners must address is "how will development add to or diminish the sustainability of this community?" taking a better balance of social, economic, and environmental factors together to form a long term vision for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities.

Chapter 1 Summary Taylor Review 2008 DCLG

Previous Consultation

The Parish Council had been working with the community to help shape the future of the parish since the development of the Community Action Plan (CAP) in 2010. The plan sought to address a wide range of issues ranging from non spatial land use to spatial land use but had no legal recognised status. Prior to the CAP, the Parish Council and Pulborough Community Partnership had worked together on the production of the Pulborough Design Statement (2011), which has been adopted by Horsham District Council (HDC) and is a legal planning document and the Village Plan. A previous neighbourhood plan was prepared between 2014 and 2015, and reached Regulation 16 consultation by HDC. Following this HDC declined to move onto a formal next stage with an Examiner, and the NPSG and Parish Council decided then to restart the NP process.

Copies of the following documents may be found and downloaded from the Parish Council website

www.pulboroughparishcouncil.gov.uk/neighbourhoodplan

- Community Action Plan
- Pulborough Design Statement
- Nutbourne Village Design Statement
- Pulborough Housing Needs Survey
- 2015 Pulborough Neighbourhood Plan draft

Plan Preparation

Pulborough Parish Council decided to prepare a Neighbourhood Plan in 2013 and Action in rural Sussex (AirS) was appointed to support the Parish Council. An **agreement** was signed by both parties dated 12th November 2013, (see **Appendix 1**). Pulborough Parish Council resolved to prepare a new Neighbourhood Plan in 2016. Support from AirS was carried forward into the new plan in part. Subsequent technical support was provided by other consultants, such as AECOM, obtained by application to Locality.

Neighbourhood Plan Steering Group

In 2016 HDC agreed that the previous work done by the NP focus groups, and the village survey done for the 2015 plan would still stand and would be used in the revised plan.

In 2016 it was agreed by Council that the existing steering group should continue, but with a reduced size, and the current steering group membership is given on page 4 of this report.

All meetings of the Steering Group were advertised on the Parish Council website and Noticeboards and copies of the agendas and meetings notes can be viewed and downloaded from www.pulboroughparishcouncil.gov.uk/neighbourhoodplan.php.

Communication and Engagement

The Steering Group identified that communication and consultation would be vital to ensure a successful Plan. At the Steering Group meeting on 17th February 2014, a **Communication and Consultation Strategy (Appendix 3)** was discussed and as a result, the following steps were taken :-

- * A logo and specific email address (pulboroughnp@gmail.com) were agreed to give identity and continuity to the process
- * All meeting notes and agendas to be posted on the Parish Council website
- * Neighbourhood Planning to be a monthly standing agenda item at all Parish Full Council meetings.
- * Neighbourhood Plan updates in the Parish Bulletin which is delivered to every home the Designated Plan Area.
- * Use of Parish Gateway signs to publicise the Plan
- * A dedicated page on the Parish Council website to hold all documentation in a downloadable format.



Designated Plan Area

At the Parish Council meeting on 19th September 2013, Members decided that, the already distinct hamlets within the Parish, namely Nutbourne, North Heath, Codmore Hill and Mare Hill in addition to the main area of Pulborough and the section of the Parish within the South Downs National Park offered sufficient diversification as to be suitable for the designated area. This definition was maintained for the revised plan.

However, the Council recognised the inter-dependency of the smaller communities and therefore decided to **write to all neighbouring Parishes** to inform them of the proposed Plan (**Appendix 4**).

An application was submitted to Horsham District Council and the South Downs National Planning Authority in November 2013 for the Designated Plan Area as shown on Page 1 and Horsham District Council, in accordance with Regulation 6 of the Neighbourhood Planning (General) Regulations 2012, **published the application** for a 6 week consultation period ending 23rd December 2013 (see **Appendix 5**).

On the 25th February 2014, Horsham District Council and the South Downs National Park Authority approved the designation of the Parish of Pulborough as a **Neighbourhood Development Plan Area** (see **Appendix 6**).

These definitions have been carried forward into the revised plan.

Funding

Following the designation approval, **successful grant** applications were submitted to both **Horsham District Council** and **Locality** (see **Appendix 7**). A further successful **grant application** was made to Locality in May 2015 (see **Appendix 7a**).

Neighbourhood Plan Focus Groups



To launch the Pulborough Parish Neighbourhood Plan process, two information events (**publicised in the local press, parish website, noticeboards, posters and Pulborough Bulletin which is delivered to every household in the Parish - see Appendices 8, 8a & 8b**) were held in the Village on 29th March & 2nd April 2014. The

aim of these events were twofold; to firstly raise awareness of the PPNP production and secondly to also invite volunteers to join focus groups.

The Steering Group established Focus Groups, based on the themes arising from the 2010 Community Action Plan, as follows :-

- * Community
- * Housing & Infrastructure
- * Environment and Heritage

- * Business and Economy
- * Transport and Accessibility
- * Health and Wellbeing

During the initial meetings of the Focus Groups it became apparent that there was some overlapping in the remit of some of the groups whilst others needed expanding. Therefore the Community group combined with Health and Wellbeing, Leisure was added to Environment and Heritage, Transport combined with Infrastructure and Housing became a stand alone group on its own.

The volunteers from the information events were invited to join one of the Focus Groups. Each group had a specific remit to discuss and they used the previous consultations, such as the Community Action Plan, to provide input to draft the subsequent survey. The Focus Groups met regularly and their activities included :-

- Review and collation of evidence from previous consultations and preparation of input for the Stage 1 Report
- Carrying out consultation with residents to assess any changes in attitude since the previous consultations.
- Input for the preparation of the Household Survey
- Attendance at public events/information displays
- Drafting of local and national stakeholders listings
- Drafting of listing of "Treasures and Assets"
- Input and attendance at Planning Policy Workshop
- Identifying the green spaces for inclusion in the Plan

The Steering Group continued to raise awareness of the fledgling plan at events such as the Pulborough EXPO held on 17th May 2014, at which **flyers** were distributed (**Appendix 9**) and volunteers recruited.



Stakeholders

The organisations and bodies identified by the Focus Groups as **Local or National Stakeholders** (see **Appendix 10**) were written to in July 2014 (see **Appendix 11**).

Household Survey

The Steering Group embarked upon a process to draft a Household Survey to be delivered to every property in the Designated Plan Area.

The Steering Group decided to put significantly more effort and expenditure into the production of the **Household Survey (Appendix 13)** than had been seen elsewhere for the following reasons :-

- to raise the profile of the Neighbourhood Plan
- to explain the Neighbourhood Plan process
- to encourage as wide a response as possible



The future publication of the survey was advertised in the June issue of the Parish Bulletin (**Appendix 12**) and on posters around the village.



Subsequently a 22 page **Household Survey** was issued to every property in August 2014 (**Appendix 13**).

A Downloadable version was also made available via the Parish Council Website.



A **series of stands** were manned by members of the Steering Group and Focus Groups as highlighted on the back of the Survey (**Appendix 14**), to encourage the completion and return of the surveys.

Boxes for the return of the surveys were distributed around the Parish to assist residents.

FULBOROUGH RESIDENTS
Please return your Neighbourhood Plan survey by 5th September



The **survey was publicised** to residents via the local press (including free publications such as Pulborough Bulletin and Sussex Local), social media together with banners on the Village gateway signs and further signage around local roads (**Appendix 15**)

Residents were asked to respond by 5th September 2014 and at the end of the period 801 responses had been received, representing 35% of the households in the designated plan area.



The **results from the survey** were then collated and initial findings publicised at the Harvest Fair, the annual village community event, that was held on 25th September 2014 (**Appendix 16**). A more in depth analysis of the results took place over the coming months and a "**Survey Results**" document was issued to every house in the plan area in the Spring of 2015 (**Appendix 17**). The results were also published on the Parish Council website with the full data available on request from the Parish Council office.

The results from the survey highlighted a lack of input from the Under 40s age range. It was therefore decided that steps should be taken to address this situation and the use of social media such as Facebook and Twitter explored to access this age group.

Due to the lack of responses from the under 40s, a specific analysis of the responses from this age group was carried out to ascertain any difference to the wider population but nothing significant was found.

The Household survey response together with the data collated by the Focus Groups were used to inform the preparation of the Stage 1 Report (Parts A & B) (available on the Parish Council Website).

The responses from the survey highlighted the following concerns/issues which influenced the future activities of the Steering Group and further details are given in the ***Executive Summary (Appendix 18)***.

- (a) Importance of rural aspects and desire to protect countryside
- (b) Traffic seen as a problem
- (c) Preference for use of brown field sites
- (d) Importance of settlements remaining physically separate
- (e) Desire for the improvement in leisure facilities
- (f) Desire for bungalows and 2 to 3 bedroom properties
- (g) Majority wish for less than 200 new dwellings in plan period
- (h) Concern over infrastructure capacity with roads being the priority
- (i) Desire for commercial space

Planning Policy Workshop

A ***Planning Policy Workshop*** was held on 4th December 2014 and invites sent to **local stakeholders** for their input (***Appendix 19***). The workshop was facilitated by Action in rural Sussex and the **reports** from the event may be found in ***Appendix 20***.

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) and Habitat Regulations Assessment (HRA)

A formal ***screening opinion*** was requested from Horsham District Council in April 2014 and a response received in May 2014 (***Appendix 21***) in which it was stated that an SEA was required, the preparation of the SA supported and advice regarding the preparation of the HRA given.

Subsequently, on 1st April 2015 the following statutory consultees were consulted on the proposed ***scope of the SA/SEA (Appendix 22)***:-

- Horsham District Council
- West Sussex County Council
- South Downs National Park Authority
- Environment Agency
- English Heritage
- Natural England

In addition, the following non statutory consultees were also written to :-

- Stopham Parish Meeting
- Wisborough Green Parish Council
- Parham Parish Council
- West Chiltington Parish Council
- Coldwaltham Parish Council
- Billingshurst Parish Council
- Storrington Parish Council

In 2018/19 a new Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) were prepared by independent consultants, commissioned by HDC, and their outputs were used in preparing the draft Pre-Submission Neighbourhood Plan.

Call for Sites

A "**Call for Sites**" was included in the Household Survey together with articles in the local press and Parish Bulletin (**Appendix 23**) for the original 2015 NP.

In addition, all those listed on the **Statutory Consultees (Local Developers and Agents)** listing (**Appendix 24**) under the Horsham District Planning Framework examination documents on the Horsham District Council website were contacted to enquire about any plans they had for the Designated Plan Area.

All sites within the parish, and ranked developable within the HDC SHELAA were included in preparing the current revised pre-submission NP

A total of 33 sites were submitted (some land owners submitting more than one) for consideration for allocation in the Neighbourhood Plan, some of which were also submitted for assessment by Horsham District Council in its Strategic Housing Land Availability Assessment (SHLAA)).

Essentially, the Steering Group sought growth to avoid isolated development (i.e. land not adjoining the Pulborough built up area boundary), land in the National Park and land at fluvial flood risk. However, taking the responses to the **Household Survey (Appendix 17)** into consideration, it was also noted that the local community was keen to see the reuse of brownfield land within or adjoining the main village. Another criterion was included to ensure that sites had sufficient residential capacity (more than 6 dwellings) to make an effective contribution towards meeting local housing needs.

The Steering Group assessed each of the sites against the agreed criteria and at subsequent meetings accepted the **Site Assessment Report** which is attached as **Appendix 25**. The site selection had to select around 250 dwellings from an overall number of 780 submitted.

The Steering Group decided to exclude from the call for sites assessment, any application already approved by Horsham District Council.

All site owners on the final list of approved sites have had meetings with the NPSG. A number of owners of sites excluded from the final shortlist have also had meetings with the NPSG.

Consultations and return to the Parish Council

A Neighbourhood Plan was prepared in 2015 and was submitted for consultation both at parish level (Regulation 14) and at district authority level (Regulation 16). As a result of comments made and interviews and discussions taking place at district authority level, it was decided by the district authority in early 2016 that the Plan should be returned to the Parish Council for the Neighbourhood Plan Steering Group to re-appraise the site assessment process prior to proceeding through Regulation 14 stage once again. That site assessment process was carried out. Both a Housing Needs Survey Report and a Site Assessment Report were commissioned from our consultant, AECOM. As a result of those reports, some policies were amended.

There was a second Call for Sites in 2017. All respondents to the first Call for Sites were written to again, together with all relevant sites in HDC's Strategic Housing & Economic Land Availability Assessment (SHELAA), and at least one site owner who came forward too late for the first Call for Sites. There was also further publicity such as a press release and discussion at the Annual Parish Meeting.

The second Pre-Submission Consultation (Regulation 14)

The Draft Proposal Pulborough Neighbourhood Development Plan was published on 6th July 2020 and made available on the Pulborough Parish Council website (www.pulboroughparishcouncil.gov.uk) and the Horsham District Council Website (www.horsham.gov.uk).

All Statutory Consultees together with other consultees, as listed in the ***Consultees for Pre-Submission Plan*** summary attached as **Appendix 26** were written to in July 2020.

The ***Consultation was advertised*** by way of local press (including the West Sussex County Times, Pulborough Community Bulletin, Sussex Local), Noticeboards, Parish Council website, church magazine, and the four village gateway signs. Use was made of social media. News of the consultation and public Zoom meetings was placed on the Parish Council website and information and several reminders were posted on the two village Facebook group pages and on Nextdoor's Pulborough Group



The entire Pre-submission Neighbourhood Plan was printed and posted across the window of an empty shop in Lower Street, where it received much attention. (**Appendix 27**).

The steering committee held 3 days of Zoom meetings with members of the public, and also answered questions from several developers/residents on the telephone. The Covid-19 restrictions meant that no physical public meeting could be safely held.

A total of 84 responses were received, including :-

- Historic England
- Natural England
- Environment Agency
- Horsham District Council
- South Downs National Park Authority
- West Sussex County Council
- Southern Water
- Sport England
- SGN (Scottish Gas Networks)

The comments received are available to read in the Parish Council office. The number of responses was considerably greater than the 48 responses received in the 2015 Regulation 14 consultation.

Issues and Concerns

The Steering Group met several times in September 2020 to review the representations made and approve the responses. The main areas highlighted in the representations were :-

- a) Residents bordering sites covered in policies 2 and 3, (New Place Nurseries and land east of Glebelands) objected to development in these areas on various grounds, the main ones being:-
 - i) Greenfield/brownfield. A particular issue raised by some residents is why some developments in the Plan should be on greenfield and not brownfield sites. It is certainly the desire of the community as reflected in the Survey and backed by government statements that development should be on brownfield sites wherever possible. In the Plan there are sites in Station Approach and London Road that are definitely brownfield. Unfortunately the same government hands down required construction figures that go way beyond the available brownfield sites in the county, district or most parishes so inevitably greenfield sites will be needed. The parish has been told, as is laid out in the Foreword to the Plan, that space has to be found in Pulborough parish for a minimum of 248 houses to be built in the period up to 2031. There are no major brownfield sites in the parish able to take those numbers so alternatives must be sought, which are, inevitably, greenfield. As a principle, and like many parishes, sites are also sought within or adjacent to the Built-up Area Boundary and therefore as close as possible to existing services. Any site put forward must be available, developable and deliverable. The current lease on New

Place Nurseries runs out soon and the Steering Group, in consultation with the site owners, understand that the site is not regarded as economically viable to continue as a nursery which places it in the frame for development.

For clarification, the nurseries are considered to be greenfield and the Submission Plan going out for consultation has been amended.

- ii) Traffic. Concern was expressed about traffic from the developments using access onto Glebelands. The developer has consulted West Sussex Highways who did not raise objections. The Steering Group has concerns about the access and in Community Aims, page 45 of the Submission Plan, has suggested redesigning the junction with the A29. Now that the A29 is part of the Major Road Network, any funding available to improve access to and from the New Place Nurseries site, as a result of that upgrade, would be welcome.
- 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 1/8th 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, page 44, has been amended to reflect a stronger desire for such accommodation in the village.

As noted on page 12, initially it was not considered necessary to make any allocations for sites that had a planning application already granted by Horsham District Council.

Regulation 14 Summary Report

The Regulation 14 Schedule of Representation and summary resulting report are attached as ***Appendices 28 and 29***.

This report summarizes the main issues and concerns raised by statutory consultees, developers/landowners and other interested organisations. It describes how these issues and concerns have been considered and where relevant how the draft plan should be amended prior to Submission.

Summary

The Draft Pulborough Parish Neighbourhood Plan has been revised to take into account, where applicable, representations made by residents and statutory consultees during the period of public consultation from 6th July to 31st August 2020. The Regulation 14 Report sets out the modifications that have been made. The modifications were agreed by the Steering Group of the Neighbourhood Plan in September 2020 and Pulborough Parish Council on 15th October 2020. Further, it was agreed that the Submission Pulborough Parish Neighbourhood Plan be submitted to Horsham District Council for Examination. All appendices to this report will be kept in Pulborough Parish Council's office and will be made available on request from HDC.

Appendices

- 1 Agreement between Action in Rural Sussex and Pulborough Parish Council for the provision of services
- 2 Steering Group Terms of Reference
- 3 Communication and Consultation Strategy
- 4 Letter to Neighbouring Parishes
- 5 HDC Notice of Consultation: Application for Neighbourhood Plan Area Designation.
- 6 HDC Designation Area: Decision Notice
- 7 HDC & Locality initial grant applications
- 7a Locality second grant application
- 8 Extract from Pulborough Bulletin
- 8a Copy pages from Pulborough Parish Council website
- 8b Posters erected to publicise inaugural events
- 9 Flyers distributed at Pulborough EXPO May 2014
- 10 Local and national stakeholder listings
- 11 Specimen letters to national and local stakeholders
- 12 Extract from Pulborough Bulletin
- 13 Household Survey
- 14 Extract from survey identifying Steering Group stands for return of surveys
- 15 Articles from West Sussex County Times (WSCT), District Post, Pulborough Parish News, Pulborough Bulletin, and Sussex Local
- 16 Survey responses publicised at Harvest Fair 27th September 2014
- 17 Survey Results document issue to every property in Plan area
- 18 Executive Summary
- 19 Invitees to Planning Policy Workshop (PPW) 4th December 2014
- 20 Notes from the working groups at the PPW

- 21 Screening opinion letter to HDC and SDNPA and response
- 22 Specimen SA/SEA Scoping letter to consultees
- 23 "Call for Sites" articles from Parish Bulletin], household survey and WSCT
- 24 Statutory Consultees from the Horsham District Council website including Local Developers & Agents contacted as part of the Call for Sites exercise
- 25 Site Assessment Report
- 26 Consultees (Statutory and Non-Statutory) for the Pre-Submission Plan
- 27 Publicity for Consultation including WSCT, Parish Bulletin, Sussex Local, extracts from Parish Council website, Flyer, poster, Village Gateway sign
- 28 Regulation 14 Schedule of Representations
- 29 Regulation 14 Consultation Report