

PULBOROUGH PARISH NEIGHBOURHOOD PLAN

2015 - 2031

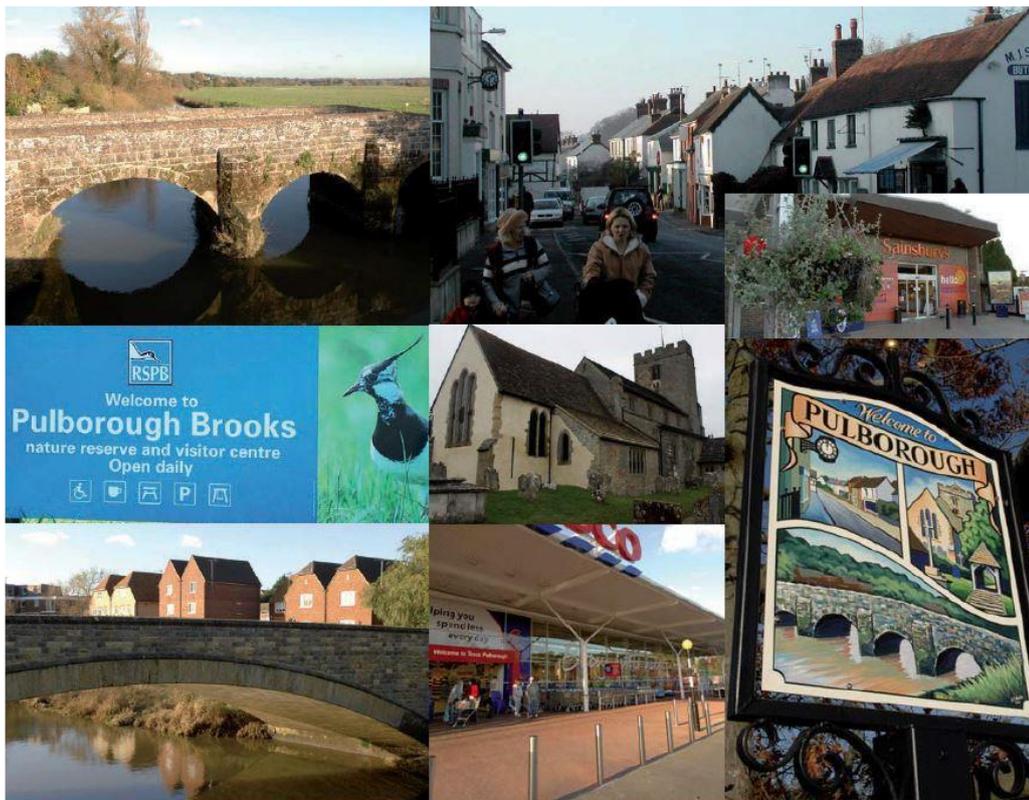
Background Study – Amendments to Policy

and Supporting Text

Policy 2 Land at New Place Farm

Policy 3 Land off Glebelands

PAPER 3



April 2021

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1.0 Introduction

- 1.1 This Background Study undertakes a review of Policies 2 and 3 and the supporting text as written within the Submission Pulborough Neighbourhood Plan (PNP). The policies relate to the sites - Land at New Place Farm and Land off Glebelands. The Study focusses on matters relating to heritage assets and the impact of allocating the sites. A site plan is attached to Appendix A of *Background Study paper 1 – Heritage Impacts*.
- 1.2 This Study draws on the information contained within *Background Study – paper 1 Heritage Impacts April 2021* and *Background Study – paper 2 SEA and Heritage Impacts April 2021*. In particular, the information contained within the SEA feeds into amendments and additions proposed for Policies 2 and 3 and the supporting text. This Study also contains a further update to the SEA as a final exercise to appraise the amended policies against sustainability objective 9.

2.0 Background

- 2.1 Concerns and an objection to the site allocations were raised by Historic England (HE) in their letters dated 28th August 2020 (Regulation 14 stage representation letter) and 13th January 2021 (Regulation 16 representation letter). Land north east of Glebelands, Pulborough application site plan. Copies of the letters are held by Pulborough Parish Council.
- 2.2 In their representations, Historic England states that both of the allocated sites lie within the area identified as 'Large Roman Settlement' on the HER's list of Archaeological Notification Areas (ANA). For that reason, it is important that an allocation should be informed by a clear understanding of the evidence on which the area has been identified as an ANA and the likely impacts of the proposed development. HE consider that this should inform a strategy within the allocation policy that guides development to avoid or minimise conflict with policies that seek to conserve the area's heritage assets. In addition, HE states that the SEA provides an inadequate understanding of the heritage assets for which proposals may have likely significant environmental effects nor does it provide an appropriate assessment of the plan. Consistently the SEA states that the nature of impacts on heritage assets are most appropriately considered at the planning application stage when details of design are available. HE considers that this is not a satisfactory approach to assessing the likely effects of plan proposals. In addition, HE is concerned that the SEA fails to identify cumulative impacts to the historic environment, such as the loss to the Large Roman Settlement ANA through development of the adjacent sites of Policies 2 and 3.
- 2.3 The information below summarises the key heritage assets and the main issues raised by HE in their representations. Further information has been included with extracts from the West Sussex Historic Environment Record (HER).

Listed Buildings

Policy 2 – Land at New Place Farm

The site is in close proximity to a grade II* listed building (New Place Manor). There is also a grade II listed building (Archway and Garden Wall at New Place Manor to south east of the House) in close proximity. These assets are historically related to each other and should therefore be considered together. Design, scale, materials, layout and landscaping of any new development will need to take into account the character and setting of the listed buildings. It is noted that both of the listed buildings lie outside the proposed site allocation and that a country park is identified as a requirement for the site in the area immediately surrounding the listed buildings.

Archaeological Notification Areas (ANA)

There is one ANA that will be affected by both site allocations. This covers the whole site (and is much larger than the two site boundaries). The ANA reference number is DWS8563 and relates to 'Large Roman Settlement Area' and falls within the red category. The key data points that are located close to/within the sites have been provided on a map as follows:

MWS2740 - Circular feature/cropmark

MWS8583 – Roman building/wall

MWS11753 - Homestreet Farm/historic farmstead

MWS3314 - Roman buildings/foundations

Outside the boundary of the ANA is a further HER data entry. This is an area adjacent to Policy 2 site allocation. Details are as follows:

MWS9181 - Land North of Glebelands Estate, Pulborough -Archaeological Investigations

The impact of proposed development and the allocation of the sites will need to be assessed in light of the ANA details held with HERS. It is likely that there may be some potential for impact on subsurface archaeological remains and that mitigation for potential harm through loss of remains will need to be considered and the requirements set out within the policies.

3.0 Amendments to Policies 2 & 3 and Supporting Text

- 3.1 Background Study paper 1 has provided updated information on the site assessment details with regards to heritage. This has concluded that accurate information needs to be presented as part of the site assessment work in the first instance.
- 3.2 The SEA is a key document underpinning how policies have been assessed against sustainability objectives. Where issues/impacts have been identified then the SEA should clearly set out mitigation measures that can be included within the policy. The Submission SEA did not clearly identify the potential impact of the development at both sites with regard to heritage assets and how this impact has been taken into account in allocating the site, as well as identifying what mitigation has been proposed to avoid or minimise these negative impacts. Amendments to the SEA are set out in an accompanying Background Study paper 2. This has indicated that further work is required to the supporting text and to Policy 2 and Policy 3.
- 3.3 This Background Study brings together the information gathered from the information set out in Background Study paper 1 and the recommended changes to the SEA and presents a set of changes to the Submission PNP supporting information and the text to each policy text.
- 3.4 For Policy 2 – Land at New Place Farm *Table 1 Changes to Supporting Text* recommends changes are made to the original submission documents. *Table 2 – Changes to Policy 2* follows and this recommends amendments to the policy text.
- 3.5 As above – the same process is followed for Policy 3 – Land off Glebelands. The recommended changes are set out in Table 3 and Table 4.

Table 1 - Policy 2 Land at New Place Farm - Changes to Supporting Text

PNP Paragraph number		Existing text with modifications where required ¹	Additional Text
New	Existing		
4.12			Pulborough Parish Council produced a Site Assessment Report April in 2019. In addition, the Submission Strategic Environmental assessment (SEA), April 2021 (as updated by Background Study Paper 2 - April 2021) provides an assessment of the site for allocation. Background Study paper 1 - April 2021 contains detailed information regarding the heritage assets impacted by the site allocation and combined with details within the submitted Consultation Statement, there is significant information to draw on to support the allocation of this site. Background Study papers produced in April 2021 consider several further additions to the policy
4.13	4.12	Land at New Place Farm has been allocated within the PNP due to the number of positive impacts the development will secure. The development principles in the policy are intended to deliver a successful housing scheme that not only blends well with the existing housing, landscape and local roads but also makes a proper contribution to improving local community infrastructure. Crucially, this scale of housing development (and that of Policy 3) can just about be accommodated in the capacity of the nearby primary school. In addition, its close proximity to the Recreation Ground means it is more beneficial for the scheme to contribute to its facilities rather than to create another public open space.	
4.17			The site is in close proximity to a grade II* listed building (New Place Manor). There is also a grade II listed building (Archway

¹ Text to be deleted is ~~crossed~~ through. New text is in **bold**.

			and Garden Wall at New Place Manor to south east of the House) in close proximity. These assets are historically related to each other and should therefore be considered together. Design, scale, materials, layout and landscaping of any new development will need to take into account the character and setting of these listed buildings.
4.18			<p>The site is located within an Archaeological Notification Area (ANA) that will be affected by the site allocation. This covers the whole site (and is much larger than the site boundary). The ANA reference number is DWS8563 and relates to 'Large Roman Settlement Area' and falls within the red category. The key data points that are located close to/within the site have been provided on the Historical Environment Records (HER) by the County Council include:</p> <p>MWS2740 - Circular feature/cropmark MWS8583 – Roman building/wall MWS11753 - Homestreet Farm/historic farmstead MWS3314 - Roman buildings/foundations</p> <p>Outside the boundary of the ANA is a further HER data entry. Details are as follows:</p> <p>MWS9181 - Land North of Glebelands Estate, Pulborough - Archaeological Investigations</p>
4.19			Further information on the site and surrounding area has also been provided though documents submitted with earlier planning applications. Taken together with the HERS details, the conclusion is that the presence of archaeological remains within the allocated site are important, but the Parish Council is of the view that they will not have a major adverse impact on identified nationally important and other significant archaeological sites. Notwithstanding the limited information available to characterise the survival, form and extent of such remains, it is considered at present that the site does not contain evidence for the presence of archaeological remains of

			such significance or extent that any need for preservation in situ would prejudice delivery of proposed development.
4.20			An appraisal of the site within the SEA has considered how to minimise conflict between the need to conserve the ANA heritage assets and the positive impact the site allocation will bring to the community. The SEA concluded that it will be necessary to provide guidance within the policy about how this conflict should be managed.
4.21			The policy requires that the design of the development, including the layout of buildings and open space, is informed by a programme of archaeological investigation.

- 3.6 In addition to proposed changes to the supporting text, the wording to Policy 2 requires amending to take on board the recommended changes submitted by Historic England and the results of the revised SEA. The revised policy is shown below. The new text is in **bold** and text to be deleted is ~~crossed through~~. A clean version of the supporting text and policy is attached as **Appendix A**.

Table 2 – Changes to Policy 2

**Policy 2: Land at New Place Farm, Pulborough –
New Place Nurseries and Land adjacent to Drovers Lane (PPNP09 & PPNP10)**

The Pulborough Neighbourhood Plan supports the development of the site known as Land at New Place Farm, Pulborough (5.8 Ha) as shown on the Policies Map for approximately 170 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. Any proposal must include a landscape-led masterplan for which there should be consideration of the following criteria:
 - a) A thorough understanding of the wider landscape impact of any proposal is demonstrated as well as considering all the elements which contribute to the character of the site. Regard should be given to visibility and key views. These should inform design and layout of the site. Long distance views to and from the South Downs National Park and Public Rights of Way should also be a consideration;
 - b) Existing field boundaries will be retained, especially the lines of mature native trees, and enhanced with native species to ensure an appropriate and effective soft scape/green transition from urban to rural and help to minimise the visual impact of the proposal.
- ii. Any proposal will deliver predominantly 2 and 3 bed dwellings to meet local need.
- iii. The layout and location of this housing will be outlined in the masterplan and should be of an appropriate scale and massing in keeping with the character of the surroundings. Regard should be given to the Pulborough Design Statement;
- iv. Any proposal will deliver affordable homes in accordance with identified need and the policies in the development plan in line with HDPF Policy 16 and the latest Strategic Housing Market Assessment (SHMA);
- v. Primary access into the site will be delivered off Glebelands (but note Community Aims page 44);
- vi. A comprehensive transport statement must be submitted with the application. Any reasonable mitigation to make the development proposal acceptable in planning terms must be implemented in full;
- vii Specific note should be taken of the east-west bridleway 2332 and the north-south footpath 2330 (see also Community Aims page 44) that cross the site in order to provide the basis of off-road movement for pedestrians and cyclists especially to shops and the school;
- viii It is considered that this development should be required to make provision for appropriate play facilities within the recommended walking distances (see 4.13 below).
- ix. A full ecological and biodiversity survey of the site is submitted as part of the application. Any reasonable mitigation proposed by the surveys must be implemented in full;
- x. A contamination assessment of the site is submitted as part of the application. Any reasonable mitigation proposed by the assessment must be implemented in full;
- xi. Support is given to the provision of Sustainable Drainage (SuDs) and other measures to avoid any net increase in water run-off contaminating the local Ramsar site (see page 8). The use of green

infrastructure should be employed with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;

xii. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park; SDNPA Technical Advice Note for Dark Skies can be found here:

<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>

xiii. A countryside park with the opportunity to create and enhance local habitats and increase biodiversity is provided on the northern half of the site in accordance with the Policy Map;

xiv. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area.

~~Assessing any potential deposits should be part of any archaeological survey.~~ **Applicants should undertake a programme of investigation that should inform the planning masterplan and application and that this should include ensuring that layout and construction of the proposals preserves archaeological remains in-situ where possible, with the highest priority given to preserving any remains identified as of national importance. Where remains of lesser importance do not merit preservation in situ applicants should be required to secure the preservation by record at an appropriate level of details of remains that will be lost. Furthermore, to ensure that the loss of archaeological remains is mitigated by benefits to the community, it is recommended that remains found as part of the archaeological investigations are recorded and made available through public display or interpretation within the neighbourhood plan area;**

xv. Any development should conserve and enhance the setting of existing listed buildings adjacent to the site;

xvi. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path. Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;

xvii. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

xviii. Future access to existing water and wastewater infrastructure must be ensured for maintenance and upsizing purposes.

xix. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).

Table 3 - Policy 3 Land off Glebelands- Changes to Supporting Text

PNP Paragraph number		Existing text with modifications where required ²	Additional Text
New	Existing		
4.23			Pulborough Parish Council produced a Site Assessment Report April in 2019. In addition, the Submission Strategic Environmental assessment (SEA), April 2021 (as updated by Background Study Paper 2 - April 2021) provides an assessment of the site for allocation. Background Study Paper 1 - April 2021 contains detailed information regarding the heritage assets impacted by the site allocation and combined with details within the submitted Consultation Statement, there is significant information to draw on to support the allocation of this site. Background Study papers produced in April 2021 consider several further additions to the policy
4.24	4.17	Land off Glebelands has been allocated within the PNP due to the number of positive impacts the development will secure. The land creates the opportunity to establish a Community Land Trust (CLT) scheme to deliver a mix of self-build and affordable homes (to be retained in perpetuity for local people). A Trust has recently been formed and is expected to bring forward a scheme as a normal planning application for the full site in due course. Should the Pulborough CLT choose not to take this up for any reason, affordable and self-build homes will continue to be supported on this site.	
4.25			The site is located within an Archaeological Notification Area (ANA) that will be affected by the site allocation. This covers the whole site (and is much larger than the site boundary). The ANA reference number is DWS8563 and relates to 'Large Roman Settlement Area' and falls within the red category.

² Text to be deleted is ~~crossed~~ through. New text is in **bold**.

			<p>The key data points that are located close to/within the site have been provided on the Historical Environment Records (HER) by the County Council include:</p> <p>MWS2740 - Circular feature/cropmark MWS8583 – Roman building/wall MWS11753 - Homestreet Farm/historic farmstead MWS3314 - Roman buildings/foundations</p>
4.26			<p>As with Policy 2, further information on the site and surrounding area has also been provided through documents submitted with earlier planning applications. Taken together with the HERS details, the conclusion is that the presence of archaeological remains within the allocated site are important, but the Parish Council is of the view that they will not have a major adverse impact on identified nationally important and other significant archaeological sites. Notwithstanding the limited information available to characterise the survival, form and extent of such remains, it is considered at present that the site does not contain evidence for the presence of archaeological remains of such significance or extent that any need for preservation in situ would prejudice delivery of proposed development.</p>
4.27			<p>An appraisal of the site within the SEA has considered how to minimise conflict between the need to conserve the ANA heritage assets and the positive impact the site allocation will bring to the community. The SEA concluded that it will be necessary to provide guidance within the policy about how this conflict should be managed.</p>
4.28			<p>The policy requires that the design of the development, including the layout of buildings and open space, is informed by a programme of archaeological investigation.</p>

Table 4 – Changes to Policy 3

Policy 3: Land off Glebelands, Pulborough (PPNP11)

The Pulborough Neighbourhood Plan supports the development of the site known as Land at Glebelands, Pulborough (0.8 Ha) as shown on the Policies Map for approximately 20 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. The entire site will come forward as a Community Land Trust proposal and will deliver affordable housing, and may provide opportunities for self-build;
- ii. Affordable housing provision will be made available to qualifying households with a local connection and should be in conformity with the Pulborough Design Statement;
- iii. Primary access will be delivered off Glebelands;
- iv. A comprehensive transport assessment would be required at the planning application stage;
- v. The area of the site may not be sufficient to require fully equipped play facilities for children but an area should be put aside for informal play and connections kept in mind to similar areas on New Place Farm.
- vi. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park.

SDNPA Technical Advice Note for Dark Skies can be found here:

<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>

- vii. Existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition/buffers from urban to rural and help to minimise the visual impact of the proposal;
- viii. Regard should be given to visibility and key views including those to and from the SDNP and Public Rights of Way. These should inform design and layout of the site;
- ix. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. ~~Assessing any potential deposits should be part of any archaeological survey;~~ **Applicants should undertake a programme of investigation that should inform the planning masterplan and application and that this should include ensuring that layout and construction of the proposals preserves archaeological remains in-situ where possible, with the highest priority given to preserving any remains identified as of national importance. Where remains of lesser importance do not merit preservation in situ applicants should be required to secure the preservation by record at an appropriate level of details of remains that will be lost. Furthermore, to ensure that the loss of archaeological remains is mitigated by benefits to the community, it is recommended that remains found as part of the archaeological investigations are recorded and made available through public display or interpretation within the neighbourhood plan area;**
- x. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path (see their page 61). Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;

- xi. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.
- xii. Support is given to the provision of Sustainable Drainage (SuDs) and other measures to avoid any net increase in water run-off contaminating the local Ramsar site (see page 8). There may be opportunities to reduce the existing run-off rates through the use of green infrastructure which should be employed with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;
- xiii. Future access to existing water and wastewater infrastructure must be ensured for maintenance and upsizing purposes.
- xiv. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).

4.0 Amendments to the SEA

- 4.1 Background Study Paper 2 proposed amendments to the SEA appraisal of the sites and the policies. These amendments recommended that revisions should be made to both the supporting text to the policy and the policy so that consideration of possible impacts on heritage are taken into account and relate to the background evidence as well as the significance of any potential archaeology remains.
- 4.2 This section now appraises the revised wording of both policies, taking into account the mitigation measures relating to the heritage assets. The SEA assessment is provided below in *Tables 6 & 7 (SEA Appraisal of Revised Policy 2 and Policy 3)*.
- 4.3 For reference – the information below shows the colours and symbols used in the SEA.

Possible Impact	Basis for Judgment
++	Strong prospect of there being significant positive impacts
+	Strong prospect of there being minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty where there is a lack on current information
0	No impact
-	Strong prospect of there being minor negative impacts and mitigation would be possible / issues can be rectified
--	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation) / further work is needed to explore whether issues can be rectified

TABLE 6 SEA Appraisal of Revised Policy 2

Land at New Place Farm, Pulborough – New Place Nurseries and Land adjacent to Drovers Lane (PPNP09 & PPNP10)

The Pulborough Neighbourhood Plan supports the development of the site known as Land at New Place Farm, Pulborough (5.8 Ha) as shown on the Policies Map for approximately 170 dwellings. Any proposal must be delivered in accordance with the following principles:

i. Any proposal must include a landscape-led masterplan for which there should be consideration of the following criteria:

- a) A thorough understanding of the wider landscape impact of any proposal is demonstrated as well as considering all the elements which contribute to the character of the site. Regard should be given to visibility and key views. These should inform design and layout of the site. Long distance views to and from the South Downs National Park and Public Rights of Way should also be a consideration;
 - b) Existing field boundaries will be retained, especially the lines of mature native trees, and enhanced with native species to ensure an appropriate and effective soft scape/green transition from urban to rural and help to minimise the visual impact of the proposal.
- ii. Any proposal will deliver predominantly 2 and 3 bed dwellings to meet local need.
- iii. The layout and location of this housing will be outlined in the masterplan and should be of an appropriate scale and massing in keeping with the character of the surroundings. Regard should be given to the Pulborough Design Statement;
- iv. Any proposal will deliver affordable homes in accordance with identified need and the policies in the development plan in line with HDPF Policy 16 and the latest Strategic Housing Market Assessment (SHMA);
- v. Primary access into the site will be delivered off Glebelands (but note Community Aims page 44);
- vi. A comprehensive transport statement must be submitted with the application. Any reasonable mitigation to make the development proposal acceptable in planning terms must be implemented in full;
- vii. Specific note should be taken of the east-west bridleway 2332 and the north-south footpath 2330 (see also Community Aims page 44) that cross the site in order to provide the basis of off-road movement for pedestrians and cyclists especially to shops and the school;
- viii. It is considered that this development should be required to make provision for appropriate play facilities within the recommended walking distances (see 4.13 below).
- ix. A full ecological and biodiversity survey of the site is submitted as part of the application. Any reasonable mitigation proposed by the surveys must be implemented in full;
- x. A contamination assessment of the site is submitted as part of the application. Any reasonable mitigation proposed by the assessment must be implemented in full;
- xi. Support is given to the provision of Sustainable Drainage (SuDs) and other measures to avoid any net increase in water run-off contaminating the local Ramsar site (see page 8). The use of green infrastructure should be employed with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;
- xii. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park; SDNPA Technical Advice Note for Dark Skies can be found here:

<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>

- xiii. A countryside park with the opportunity to create and enhance local habitats and increase biodiversity is provided on the northern half of the site in accordance with the Policy Map;
- xiv. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Applicants should undertake a programme of investigation that should inform the planning masterplan and application and that this should include ensuring that layout and construction of the proposals preserves archaeological remains in-situ where possible, with the highest priority given to preserving any remains identified as of national importance. Where remains of lesser importance do not merit preservation in situ applicants should be required to secure the preservation by record at an appropriate level of details of remains that will be lost. Furthermore, to ensure that the loss

of archaeological remains is mitigated by benefits to the community, it is recommended that remains found as part of the archaeological investigations are recorded and made available through public display or interpretation within the neighbourhood plan area;

xv. Any development should conserve and enhance the setting of existing listed buildings adjacent to the site;

xvi. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path. Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;

xvii. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

xviii. Future access to existing water and wastewater infrastructure must be ensured for maintenance and upsizing purposes.

xix. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).

Temporal Effects³	Objective 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance
Short Term	+
Medium Term	+
Long Term	+

The policy now scores as having a ‘strong prospect of there being minor positive impacts’ on objective 9 – To conserve and where appropriate enhance areas and assets of historical and archaeological importance. More information has been included within the policy to reflect the consultation response from Historic England (HE) at the Reg 14 and Reg 16 stage. The amended sections of the policy relate to the ANAs.

In addition, the supporting text to the policy is widened to include details from the information gathering exercise carried out in Background Study paper 1 and the SEA (as set out in Background Study paper 2) so that it is clear why the site is suitable for allocation and how the policy addresses the existence of the ANA. The proposed amendment secures a process of ensuring archaeological remains are either preserved or recorded.

³ (S) Short term: early stages of the plan period

(M) Medium Term: middle stages of the plan period

(L) Long term: latter stages of the plan period and where relevant beyond.

TABLE 7 SEA Appraisal of Revised Policy 3

Land off Glebelands, Pulborough (PPNP11)

Policy 3: Land off Glebelands, Pulborough (PPNP11)

The Pulborough Neighbourhood Plan supports the development of the site known as Land at Glebelands, Pulborough (0.8 Ha) as shown on the Policies Map for approximately 20 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. The entire site will come forward as a Community Land Trust proposal and will deliver affordable housing, and may provide opportunities for self-build;
- ii. Affordable housing provision will be made available to qualifying households with a local connection and should be in conformity with the Pulborough Design Statement;
- iii. Primary access will be delivered off Glebelands;
- iv. A comprehensive transport assessment would be required at the planning application stage;
- v. The area of the site may not be sufficient to require fully equipped play facilities for children but an area should be put aside for informal play and connections kept in mind to similar areas on New Place Farm.
- vi. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park. SDNPA Technical Advice Note for Dark Skies can be found here:
<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>
- vii. Existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition/buffers from urban to rural and help to minimise the visual impact of the proposal;
- viii. Regard should be given to visibility and key views including those to and from the SDNP and Public Rights of Way. These should inform design and layout of the site;
- ix. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Applicants should undertake a programme of investigation that should inform the planning masterplan and application and that this should include ensuring that layout and construction of the proposals preserves archaeological remains in-situ where possible, with the highest priority given to preserving any remains identified as of national importance. Where remains of lesser importance do not merit preservation in situ applicants should be required to secure the preservation by record at an appropriate level of details of remains that will be lost. Furthermore, to ensure that the loss of archaeological remains is mitigated by benefits to the community, it is recommended that remains found as part of the archaeological investigations are recorded and made available through public display or interpretation within the neighbourhood plan area;
- x. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path (see their page 61). Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;
- xi. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.
- xii. Support is given to the provision of Sustainable Drainage (SuDs) and other measures to avoid any net increase in water run-off contaminating the local Ramsar site (see page 8). There may be opportunities to reduce the existing run-off rates through the use of green infrastructure which should be employed with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;
- xiii. Future access to existing water and wastewater infrastructure must be ensured for maintenance and upsizing purposes.

xiv. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).	
Temporal Effects⁴	Objective 9. To conserve and where appropriate enhance areas and assets of historical and archaeological importance
Short Term	+
Medium Term	+
Long Term	+
<p>The policy now scores as having a ‘strong prospect of there being minor positive impacts’ on objective 9 – To conserve and where appropriate enhance areas and assets of historical and archaeological importance. More information has been included within the policy to reflect the consultation response from Historic England (HE) at the Reg 14 and Reg 16 stage. The amended sections of the policy relate to the ANAs.</p> <p>In addition, the supporting text to the policy is widened to include details from the information gathering exercise carried out in Background Study paper 1 and the SEA (as set out in Background Study paper 2) so that it is clear why the site is suitable for allocation and how the policy addresses the existence of the ANA. The proposed amendment secures a process of ensuring archaeological remains are either preserved or recorded.</p>	

⁴ (S) Short term: early stages of the plan period

(M) Medium Term: middle stages of the plan period

(L) Long term: latter stages of the plan period and where relevant beyond.

APPENDIX A
Clean version of supporting
text and Policy 2

**Policy 2: Land at New Place Farm, Pulborough –
New Place Nurseries and Land adjacent to Drovers Lane (PPNP09 & PPNP10)**

The Pulborough Neighbourhood Plan supports the development of the site known as Land at New Place Farm, Pulborough (5.8 Ha) as shown on the Policies Map for approximately 170 dwellings. Any proposal must be delivered in accordance with the following principles:

i. Any proposal must include a landscape-led masterplan for which there should be consideration of the following criteria:

a) A thorough understanding of the wider landscape impact of any proposal is demonstrated as well as considering all the elements which contribute to the character of the site. Regard should be given to visibility and key views. These should inform design and layout of the site. Long distance views to and from the South Downs National Park and Public Rights of Way should also be a consideration;

b) Existing field boundaries will be retained, especially the lines of mature native trees, and enhanced with native species to ensure an appropriate and effective soft scape/green transition from urban to rural and help to minimise the visual impact of the proposal.

ii. Any proposal will deliver predominantly 2 and 3 bed dwellings to meet local need.

iii. The layout and location of this housing will be outlined in the masterplan and should be of an appropriate scale and massing in keeping with the character of the surroundings. Regard should be given to the Pulborough Design Statement;

iv. Any proposal will deliver affordable homes in accordance with identified need and the policies in the development plan in line with HDPF Policy 16 and the latest Strategic Housing Market Assessment (SHMA);

v. Primary access into the site will be delivered off Glebelands (but note Community Aims page 44);

vi. A comprehensive transport statement must be submitted with the application. Any reasonable mitigation to make the development proposal acceptable in planning terms must be implemented in full;

vii Specific note should be taken of the east-west bridleway 2332 and the north-south footpath 2330 (see also Community Aims page 44) that cross the site in order to provide the basis of off-road movement for pedestrians and cyclists especially to shops and the school;

viii It is considered that this development should be required to make provision for appropriate play facilities within the recommended walking distances (see 4.13 below).

ix. A full ecological and biodiversity survey of the site is submitted as part of the application. Any reasonable mitigation proposed by the surveys must be implemented in full;

x. A contamination assessment of the site is submitted as part of the application. Any reasonable mitigation proposed by the assessment must be implemented in full;

xi. Support is given to the provision of Sustainable Drainage (SuDs) and other measures to avoid any net increase in water run-off contaminating the local Ramsar site (see page 8). The use of green infrastructure should be employed with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;

xii. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park; SDNPA Technical Advice Note for Dark Skies can be found here:

<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>

xiii. A countryside park with the opportunity to create and enhance local habitats and increase biodiversity is provided on the northern half of the site in accordance with the Policy Map;

xiv. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Applicants should undertake a programme of investigation that should inform the planning masterplan and application and that this should include ensuring that layout and construction of the proposals preserves archaeological remains in-situ where possible, with the highest priority given to preserving any remains identified as of national importance. Where remains of lesser importance do not merit preservation in situ applicants should be required to secure the preservation by record at an appropriate level of details of remains that will be lost. Furthermore, to ensure that the loss of archaeological remains is mitigated by benefits to the community, it is recommended that remains found as part of the archaeological investigations are recorded and made available through public display or interpretation within the neighbourhood plan area;

xv. Any development should conserve and enhance the setting of existing listed buildings adjacent to the site;

xvi. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path. Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;

xvii. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

xviii. Future access to existing water and wastewater infrastructure must be ensured for maintenance and upsizing purposes.

xix. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).

- 4.11 This policy allocates New Place Farm Nursery located on the northern edge of Pulborough village and the land immediately to the south of the nursery, for a housing scheme that may comprise 170 dwellings. The land is available for development and the landowner has indicated an approval in principle to the provisions of this policy.
- 4.12 Pulborough Parish Council has produced a Site Assessment Report April 2019. In addition, the Submission Strategic Environmental assessment (SEA) April 2021 (as updated by Background Study Paper 2 April 2021) provides an assessment of the site for allocation. Background Study paper 1 April 2021 contains detailed information regarding the heritage assets impacted by the site allocation and combined with details within the submitted Consultation Statement, there is significant information to draw on to support the allocation of this site. Background Study papers produced in April 2021 consider several further additions to the policy
- 4.13 Land at New Place Farm has been allocated within the PNP due to the number of positive impacts the development will secure. The development principles in the policy are intended to deliver a successful housing scheme that not only blends well with the existing housing, landscape and local roads but also makes a proper contribution to improving local

- community infrastructure. Crucially, this scale of housing development (and that of Policy 3) can just about be accommodated in the capacity of the nearby primary school. In addition, its close proximity to the Recreation Ground means it is more beneficial for the scheme to contribute to its facilities rather than to create another public open space
- 4.14 The Horsham District Sport, Open Space & Recreation Study (2014) recommends play facilities should be within 400m. In addition, Fields in Trust recommend a 100m walking distance to a Local Area for Play (aimed at very young children) and 400m for a Locally Equipped Area for Play.
- 4.15 The NPSG is keen to see the use of native trees in all plantings and existing native trees retained. However, the current nursery has used many large Leylandii trees as windbreaks and we would be pleased if these are removed and replaced with native trees.
- 4.16 At the western end of Bridleway 2332, opposite the allotments, there is a flat area of land adjacent to the bridleway. The NPSG consider that in the future this may be suitable for homes for elderly people because of the relative proximity of the medical centre and large store.
- 4.17 The site is in close proximity to a grade II* listed building (New Place Manor). There is also a grade II listed building (Archway and Garden Wall at New Place Manor to south east of the House) in close proximity. These assets are historically related to each other and should therefore be considered together. Design, scale, materials, layout and landscaping of any new development will need to take into account the character and setting of the listed buildings.
- 4.18 The site is located within an Archaeological Notification Area (ANA) that will be affected by the site allocation. This covers the whole site (and is much larger than the site boundary). The ANA reference number is DWS8563 and relates to 'Large Roman Settlement Area' and falls within the red category. The key data points that are located close to/within the site have been provided on the Historical Environment Records (HER) by the County Council include:
- MWS2740 - Circular feature/cropmark
 - MWS8583 – Roman building/wall
 - MWS11753 - Homestreet Farm/historic farmstead
 - MWS3314 - Roman buildings/foundations
- Outside the boundary of the ANA is a further HER data entry. Details are as follows:
- MWS9181 - Land North of Glebelands Estate, Pulborough -Archaeological Investigations
- 4.19 Further information on the site and surrounding area has also been provided through documents submitted with earlier planning applications. Taken together with the HERS details, the conclusion is that the presence of archaeological remains within the allocated site are important, but the Parish Council is of the view that they will not have a major adverse impact on identified nationally important and other significant archaeological sites. Notwithstanding the limited information available to characterise the survival, form and extent of such remains, it is considered at present that the site does not contain evidence for the presence of archaeological remains of such significance or extent that any need for preservation in situ would prejudice delivery of proposed development.
- 4.20 An appraisal of the site within the SEA has considered how to minimise conflict between the need to conserve the ANA heritage assets and the positive impact the site allocation will

bring to the community. The SEA concluded that it will be necessary to provide guidance within the policy about how this conflict should be managed.

- 4.21 The policy requires that the design of the development, including the layout of buildings and open space, is informed by a programme of archaeological investigation.

APPENDIX B

**Clean version of supporting
text and Policy 3**

Policy 3: Land off Glebelands, Pulborough (PPNP11)

The Pulborough Neighbourhood Plan supports the development of the site known as Land at Glebelands, Pulborough (0.8 Ha) as shown on the Policies Map for approximately 20 dwellings. Any proposal must be delivered in accordance with the following principles:

- i. The entire site will come forward as a Community Land Trust proposal and will deliver affordable housing, and may provide opportunities for self-build;
- ii. Affordable housing provision will be made available to qualifying households with a local connection and should be in conformity with the Pulborough Design Statement;
- iii. Primary access will be delivered off Glebelands;
- iv. A comprehensive transport assessment would be required at the planning application stage;
- v. The area of the site may not be sufficient to require fully equipped play facilities for children but an area should be put aside for informal play and connections kept in mind to similar areas on New Place Farm.
- vi. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park.
SDNPA Technical Advice Note for Dark Skies can be found here:
<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>
- vii. Existing field boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition/buffers from urban to rural and help to minimise the visual impact of the proposal;
- viii. Regard should be given to visibility and key views including those to and from the SDNP and Public Rights of Way. These should inform design and layout of the site;
- ix. Part of the intended site covers the Large Roman Settlement Archaeological Notification Area. Applicants should undertake a programme of investigation that should inform the planning masterplan and application and that this should include ensuring that layout and construction of the proposals preserves archaeological remains in-situ where possible, with the highest priority given to preserving any remains identified as of national importance. Where remains of lesser importance do not merit preservation in situ applicants should be required to secure the preservation by record at an appropriate level of details of remains that will be lost. Furthermore, to ensure that the loss of archaeological remains is mitigated by benefits to the community, it is recommended that remains found as part of the archaeological investigations are recorded and made available through public display or interpretation within the neighbourhood plan area;
- x. The Habitats Regulations Assessment April 2020 identifies this site as being close to a specific bat flight path (see their page 61). Schemes proposed for a site shall identify and retain those features on site that are particularly important for bats and any impacts likely to cause disturbance to important routes used by bats for foraging or commuting; and show how and where any external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory;
- xi. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances

should any other external lighting be installed without prior consent from the local planning authority.

xii. Support is given to the provision of Sustainable Drainage (SuDs) and other measures to avoid any net increase in water run-off contaminating the local Ramsar site (see page 8). There may be opportunities to reduce the existing run-off rates through the use of green infrastructure which should be employed with the opportunity to create and enhance local habitats and bring about a net increase in biodiversity;

xiii. Future access to existing water and wastewater infrastructure must be ensured for maintenance and upsizing purposes.

xiv. Developers should submit a Construction Environment Management Plan showing how they will avoid damaging local water quality by preventing water runoff from the site (see page 8).

- 4.22 This policy allocates land immediately to the south of New Place Farm for a housing development scheme that may comprise 20 dwellings intended as affordable homes for local people in perpetuity and as self-build homes. The land has been made available for this purpose by the landowner.
- 4.23 Pulborough Parish Council has produced a Site Assessment Report April 2019. In addition, the Submission Strategic Environmental assessment (SEA) April 2021 (as updated by Background Study Paper 2 April 2021) provides an assessment of the site for allocation. Background Study paper 1 April 2021 contains detailed information regarding the heritage assets impacted by the site allocation and combined with details within the submitted Consultation Statement, there is significant information to draw on to support the allocation of this site. Background Study papers produced in April 2021 consider several further additions to the policy.
- 4.24 Land off Glebelands has been allocated within the PNP due to the number of positive impacts the development will secure. The land creates the opportunity to establish a Community Land Trust (CLT) scheme to deliver a mix of self-build and affordable homes (to be retained in perpetuity for local people). A Trust has recently been formed and is expected to bring forward a scheme as a normal planning application for the full site in due course. Should the Pulborough CLT choose not to take this up for any reason, affordable and self-build homes will continue to be supported on this site
- 4.25 The site is located within an Archaeological Notification Area (ANA) that will be affected by the site allocation. This covers the whole site (and is much larger than the site boundary). The ANA reference number is DWS8563 and relates to 'Large Roman Settlement Area' and falls within the red category. The key data points that are located close to/within the site have been provided on the Historical Environment Records (HER) by the County Council include:
- MWS2740 - Circular feature/cropmark
 - MWS8583 – Roman building/wall
 - MWS11753 - Homestreet Farm/historic farmstead
 - MWS3314 - Roman buildings/foundations
- 4.26 As with Policy 2, further information on the site and surrounding area has also been provided though documents submitted with earlier planning applications. Taken together with the HERS details, the conclusion is that the presence of archaeological remains within the allocated site are important, but the Parish Council is of the view that they will not have

a major adverse impact on identified nationally important and other significant archaeological sites. Notwithstanding the limited information available to characterise the survival, form and extent of such remains, it is considered at present that the site does not contain evidence for the presence of archaeological remains of such significance or extent that any need for preservation in situ would prejudice delivery of proposed development.

- 4.27 An appraisal of the site within the SEA has considered how to minimise conflict between the need to conserve the ANA heritage assets and the positive impact the site allocation will bring to the community. The SEA concluded that it will be necessary to provide guidance within the policy about how this conflict should be managed.
- 4.28 The policy requires that the design of the development, including the layout of buildings and open space, is informed by a programme of archaeological investigation.