

#### Appendix 4. SDNPA representation to Pre Submission Consultation of Petersfield Neighbourhood Plan

Reference	Comment	SDNPA Recommendation to the Town Council
<b>General Comment</b>		
I.1	The progression of the PNP to pre-submission stage is to be welcomed and is a result of a considerable amount of hard work by volunteers, officers and members. Neighbourhood planning is a form of community empowerment and has led to greater local engagement in the planning process in Petersfield.	Consider putting all the objectives, policies and allocations for each specific topic in individual chapters, such as housing rather than splitting the policy and objectives and placing in two separate parts of the PNP
I.2	The objectives, policies and allocation maps are set out in different parts of the plan. This makes the PNP difficult to navigate and understand. In order to improve readability particularly for the general public the Town Council could consider putting all the objectives, policies and allocations for specific topics together in separate chapters	
I.3	Section 7.3.1 needs attention to properly reflect what green infrastructure means and what the plan is trying to achieve. A statement has been prepared to guide the PTC as to what this introductory paragraph could include.	Consider including the following paragraph in section 7.3.1 - Green Infrastructure goes beyond the provision of open space, It is the identification and planning of a multi functional network of features to provide sustainable transport, biodiversity, ecosystem services, recreational spaces and climate change adaptation based on the principles of connectivity.
I.4	Section 7.3.6 sets out introductory text to reducing flood risk. Although Green infrastructure is referenced in the policy wording there is no reference in the introductory text it should be highlighted that where possible flooding mitigation measures should be incorporated as part of the planned green infrastructure network. Mitigation measures should contribute to the planned green infrastructure network and this should be reflected in Policy NEP7.	Review Section 7.3.6 and Policy NEP7 to ensure that the introductory text and policy wording positively reference mitigation measures and how these should contribute to the planned green infrastructure network.

1.5	Section 11.5.1 Shared Space Town Centre – Has this section of the PNP been reviewed by Highways Authority? This will need to be considered by the highways authority as to whether it is considered appropriate and if indeed the scheme is achievable. Modelling will be required to test the validity of this proposal and this will need to be tested prior to the formal submission	Section 11.5.1 should be highlighted to the highways authority for their full attention and consideration
1.6	Section 12.4 – 12.12 ( general point regarding densities) The National Planning Policy Framework does not include or require minimum or maximum densities; the guidance is more related to making the best use of available land. Whilst SDNPA understand the reason for setting minimum densities (to demonstrate meeting the minimum strategic housing requirement) these should be stated as a guide for developers, not a strict rule. It may be more appropriate to set an indicative number of dwellings to be provided	Consider an addition to the text in Section 12.4-12.12 or in the introductory text to 12.3 that the minimum density guides are not a strict rule. It may be more appropriate to set an indicative number of dwellings to be provided rather than a specific target.
1.7	13.2 Housing Policy HP9, First Paragraph, Final Sentence This policy sets out a requirement for any planning applications to demonstrate that proposals will score 12 out of 12 greens when assessed against the building for life assessment. SDNPA consider that this may be difficult to include as a requirement, and perhaps should be included as an aspiration	Consider review of Policy HP9 which currently required a score of 12 out of 12 greens when assessed against building for life standards. This could be extremely challenging and may impact development viability therefore PTC are recommended to consider setting this out as an aspiration.
1.8	The SDNPA purposes and duty should be expressed more throughout the PNP. All bodies and organisations have a duty to have regard to National Park purposes and Duty when carrying out their function. Therefore the PTC should demonstrate how it meets with the requirement of Section 62, 11(A) of the Environment Act 1995 to have regard	To ensure the National Park purposes are reflected in the PNP policy and supporting text

	to the purposes for which National Parks are designated	
The Vision Statement		
2.1	<p>The vision that Petersfield will be a thriving market town and a gateway to the South Downs National Park is clear and succinct and welcomed by the SDNPA. However, reference should also be made to the purposes of the National Park as set out in the Environment Act 1995 and to the fact that the Town Council has a duty of regard to these purposes, which are:</p> <p>To conserve and enhance the natural beauty, wildlife and cultural heritage</p> <p>To promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public</p> <p>When national park authorities carry out these purposes, they also have the duty to: seek to foster the economic and social well-being of the local communities within the national park in pursuit of the purposes, without incurring significant expenditure in doing so and in co-operation with local authorities and public bodies.</p>	<p>Make more specific and clear reference to the purposes and duty of the SDNPA. This should be clearly set out in the vision statement with reference also made clear in the introduction of the plan, setting the context for the Neighbourhood Plan. This could also include reference to the SDNP Special Qualities and Partnership Management Plan.</p>
Housing Policies		
3.1	<p>Objective HO1 seeks to allocate sufficient development sites to meet the requirements of the East Hampshire Local Plan: Joint Core Strategy (JCS). Policy HPI allocates sufficient sites to provide 701 new homes. Policy CPI0 of the JCS requires the allocation of sites to provide a minimum of 700 dwellings at Petersfield. Therefore policy HPI just meets the strategic requirement for housing in the</p>	<p>Work in conjunction with SDNPA officers to review Policy HPI and the site selection process to establish whether a higher allocation of housing is possible without negative impact on landscape. PTC should also review the dwellings per hectare applied to each site as set out in Policy HPI to establish whether higher density on certain sites can provide increased allocation and therefore provide more certainty in meeting the strategic requirement of a minimum of 700. For example the housing</p>

	JCS although there is no flexibility to make good any shortfall if any of the named sites fail to come forward. Furthermore, it is stated that site H10 will only be deliverable when the community centre is provided elsewhere. The loss of this small site would mean that the PNP could not meet its housing requirement set in the JCS.	density at site H1 could be increased and the site boundary adjusted slightly (but not to the extent of the full reserve site) in return for an undertaking that the remaining open land would be protected in perpetuity and not just for the lifetime of the plan.
3.2	Housing Objective HO2 deals with affordable housing and housing for local people. Policy HP2 deals with the mix of market housing. This requires 70% of new market housing to be 3 or 4 bedroomed. This would seem to be at odds with the community feedback on housing that there should be more housing suitable for young people and first time buyers and housing for growing families. Policy HP2 also requires 75% of 3 bed houses to be for housing for the elderly. This would seem unduly onerous as it would not meet the need of retired 'downsizers' or the needs of growing families.	Review policy HP2 and provide further evidence to support the mix of market housing. The PNP should make clear distinction between the mix of market housing and the proposed housing mix for affordable housing. Currently HP5 states that affordable housing will be predominately 1&2 bed but housing mix will be agreed with EHDC housing officers. The PNP must make clear why the market housing mix is weighted towards larger dwellings and set out clearly why this responds to community aspiration and evidence which underpins the plan. PTC to set out the evidence used to support this policy.
3.3	Policy HP3 allocates site H8 for housing for the elderly and waives the need for on-site provision of affordable housing. While not objecting to this, it is not clear what evidence underpins why site H8 has been identified as appropriate for housing for the elderly, or why it has been exempted from providing on-site affordable housing. It is understood that this site is being considered by the owners and a Registered Social Landlord for an extra care 'village' but no reference is made to this or to whether such a scheme would be acceptable within the term 'dwellings' since some of the accommodation would be institutional (C2) and so may not count towards the 700 target.	Provide further information to support the justification for this allocation for housing for the elderly and the exemption from on-site affordable housing. Consider whether to refer specifically to the care village proposed for the site.
3.4	Policy HP4 deals with the phasing of development.	PTC to note that phasing development may come under scrutiny at

	<p>The policy states that self build sites H2 and H11 (totalling 112 units) will be exempt from phasing policy as they are likely to be built over the lifetime of the plan. . Furthermore, it should be noted by PTC that it may be difficult to influence when a particular site should come forward for development, particularly if that site is suitable, deliverable and available as per the NPPF.</p>	<p>Examination if this could unreasonably delay release of developable sites in Petersfield.</p>
3.5	<p>Policy HP5 deals with affordable housing. Reference is made to a financial contribution to 'community affordable housing.' Further information is required on this matter, what financial contribution would be expected, and how would this contribute to the provision of affordable housing. The policy also states that most affordable homes will be 1 or 2 bedroomed units. Further justification should be provided on why larger family units are not required. It would also be useful to provide some information on viability and whether there will be any flexibility on the affordable housing requirements. Reference is made in the text to 'special circumstances' and it would be useful to know more about this and whether it includes viability. The PNP may want to consider including reference to requesting an 'open book' approach in these situations so viability can be tested on each site and ensure that the best provision of affordable housing or contribution to affordable housing is sought.</p>	<p>Provide further clarification in the PNP as to what 'financial contribution' would be sought to provide 'community affordable housing' and as to what this term means (as distinct from 'affordable housing').</p> <p>Set out clearly what evidence exists to justify why predominately 1&amp;2 bedroom units are required as opposed to larger family units. Establish whether there will be any flexibility in terms of affordable housing provision, and provide evidence to support the current proportion of affordable housing provision including any viability assessment which supports this proposal.</p>
3.6	<p>Policy HP6 deals with the provision of market housing for local people. The policy states that, for developments of 10 or more dwellings, 10% of the housing stock should be restricted to people with a local Petersfield connection, and the value of the house should be 90% of current market value. Whilst the plan should be commended for this as it</p>	<p>Provide robust evidence to clarify the need for this policy. The PTC need to demonstrate what issue this policy is trying to address and provide robust evidence to support this policy approach.</p> <p>Provide clarification as to the mechanism to be put in place to administer and monitor the intention of this policy, clearly setting out who is required to carry out the checks that this policy is being upheld.</p>

	responds directly to community feedback, the PTC do need to provide clarification as to how this would be administered. PTC would also be strongly advised to seek legal advice as to the legality of this policy.	Seek legal advice on this policy and whether it would be deemed to impact human rights legislation.
	Policy HP6 sets out policy to ensure provision of housing for local people. The policy is to be commended but advice should be sought as to the appropriateness of including parishes (Rogate and Harting) which are outside the District of East Hampshire and the County of Hampshire	Seek further clarification regarding a local connection policy which allows residents of neighbouring parishes (Rogate and Harting) to be eligible for a local connection to Petersfield although the parishes are in a different district/county. Suggest speaking to the Local Housing Authority and seek legal advice if necessary.
3.7	Policy HP7 deals with custom and self build dwellings. It clearly sets out criteria relating to design and affordable housing. It also sets out eligibility criteria. The Town Council should also consider including a perpetuity clause so that the home is not sold on shortly after being built. Separate evidence is provided to justify the need for and the deliverability of this proposal, but it would be useful to include in the plan more information about the mechanisms that will be put in place to ensure the delivery of these sites. . Site H2 intends to provide 101 self build units, with no current infrastructure or services provided for the site. The PNP must state clearly how this site will be delivered to meet the strategic housing requirements set out in the EHJCS	Consider including a perpetuity clause in relation to Policy HP7 to ensure self build units remain in local ownership and provide for local needs. Set out clearly in the Plan the mechanisms which will be put in place to ensure the delivery of self build sites H2 and H11.
Built Environment Policies		
	Generally reference to design appears to apply to housing development only. The PTC should seek to strengthen the case for good design by requiring all development to meet the highest design standards	Make specific reference to high quality design in BEPI and cross reference with Policy BPI and RPI to ensure good quality design is considered in all forms of built development.
	BEPI is designed to ensure the highest quality of design, SDNPA welcome this policy. To strengthen this policy and ensure clarity for developers and applicants it is suggested that the PTC make clear	Make reference to current relevant design and characterisation guidance in Policy BEPI to ensure clarity in terms of what is considered appropriate design???????

	reference in the policy text to more detailed guidance on local design standards, including the landscape character study and design guidance from other bodies including CABI?????	
	BEP1 makes limited reference to public realm, street scene or town scape. These points should be considered and included if appropriate in the policy wording. Public Realm includes items such as street furniture, spaces between buildings, surfaces and materials, whilst limited reference is made in the policy this could be enhanced.	Make appropriate reference to public realm matters in Policy BEP1
4.1	Policy BEP4 deals with shop fronts. The existing EHDC shop front guidance is referenced in this policy. Although the guidance is considered to be generally appropriate, some of the contents of this document are rendered redundant by changes in legislation, for example the reference to conservation area consent. This policy could be future proofed by making reference to any forthcoming shop front guidance that may be produced by the SDNPA.	Make provision for future proofing policy BEP4 by making reference to possible future replacement of the EHDC shop front guidance. The policy should make provision for its replacement by including the words 'or any document which succeeds it' after 'Shop fronts Design Guide (2003)'
4.2	Policy BEP5 sets out standards for sustainable construction. The policy refers to Code for Sustainable Homes Level 5. Whilst this is supported in principle the code is being withdrawn by Government which will mean this policy is out of date. The code will be covered by building regulations, specifically part L will refer to energy efficiency of domestic buildings.	PTC consider reviewing this policy to remove reference to Code for Sustainable Homes.
Natural Environment Policy		
	Policy NEP4 sets out to ensure all development contributes positively to the setting of Petersfield and ensures that the sensitivity of the landscape is recognised and enhanced. Given the position of Petersfield in the surrounding landscape the PTC	PNP to highlight the importance of views from higher ground into Petersfield particularly views from the South Downs Way and the Hangers Way, as these two routes provide views into the town which should not be detracted from by inappropriate development.

	should highlight the importance of views into the parish from higher ground, particularly the South Downs Way and Hangers Way.	
	The landscape studies which have been conducted by the SDNPA could be used more effectively to influence development if they are included as supporting documents rather than just referenced in section 14.2. It is suggested that the group consider these are included as supporting evidence and make specific reference to their use in forming applications in Policy NEP3 and NEP4	SDNPA Landscape assessments and capacity studies should be included as supporting documents to strengthen the landscape policy in Natural Environment section with specific reference to them in Policy NEP3 and NEP4 to ensure due regard is taken of the study when applications are prepared.
Business Policies		
	The PNP does not appear to have considered the option of live work units. This proposal may assist in meeting the housing target and delivering the shortfall of employment land. Also it is likely that this type of unit would be attractive to those wishing to run a business from a home location.	Consider the inclusion of live/work units to meet required housing and employment allocation and offer a flexible live work solution for local people.
5.1	Business Objective BPI seeks to attract and retain businesses that can provide employment opportunities for local people. Policy BPI allocates sites for employment and table 17 sets out the employment site allocations. The PNP needs to be in general conformity with the strategic policies of the JCS. Policy CP3 of the JCS requires the provision of about 3ha of employment land in Petersfield. Policy BPI of the PNP only allocates 2.51 ha, which means that there is a shortfall of employment of 0.49 ha. The plan justifies this shortfall by stating that a thorough and exhaustive site selection process failed to identify sufficient sites for employment. It is acknowledged in the document that there is an unmet need for new employment land and suggests that this could be met	Give further consideration to whether this shortfall of employment land is justified. The PTC should seek to allocate the full 3Ha of employment land as specified in the EHJCS. The proposal for unmet allocation to be delivered in surrounding parishes should be removed, as this may set an unwelcome precedent for allocating employment land in unconnected rural locations. If the allocation of further employment sites would prejudice the statutory purposes of the National Park this should be stated clearly.



	in the neighbouring parishes. PTC should seek to allocate the full 3Ha requirement as set out in the EHJCS. The suggestion that any shortfall should be found in neighbouring parishes should be resisted as this may lead to employment sites being located in unsustainable rural locations far from public transport and other services and facilities.	
5.2	Business Policy BP1 includes Table 17 which sets out ten sites for employment land allocations totalling a total of 27.85 ha, but only allocates 2.51 ha. Further clarification is required on the status of these additional sites. The policy states that 'applications for any other use on this land will not be approved. This is rather blunt and such policies are usually subject to various provisos and criteria, particularly in the light of paragraph 22 of the NPPF. See Issue 39 in the South Downs Local Plan Options Document.	Provide further clarification to the status of all employment sites described in Table 17 under policy BP1 and consider whether any further criteria are required
5.3	Business Policy BP2 protects existing employment sites. National policy set out in the NPPF requires a more flexible approach to the protection of employment sites. One way forward is to require change of use applications that would result in the loss of employment premises to provide some information on the marketing of the premises. A robust but unsuccessful marketing campaign would indicate that an employment site may no longer be fit for purpose and could be redeveloped for other purposes.	Consider including a marketing clause into policy BP2 so that employment premises that are not fit for purpose are protected from redevelopment opportunities. Other criteria should also be considered as suggested in 5.2 above.
5.4	Business Policy BP3 seeks to encourage new businesses to come to Petersfield. Whilst the intention of the policy is supported, clarification is required as to how new business can be accommodated given the landscape constraints and the current and potential future shortfall of employment land in the town. If indeed attracting	Business Policy BP3 is removed given the current and future prediction of a shortfall in employment land and the high priority which must be given to protection and enhancement of landscape and scenic beauty.

	new business to Petersfield could prejudice the statutory purposes of the SDNPA, this approach should be resisted.	
<b>Retail Policies</b>		
6.1	The introduction to the retail chapter of the PNP refers to the East Hants Local Plan and states that there is no requirement for new retail floor space in Petersfield. However, paragraph 5.42 of the JCS identified a need of 1,366 m2 of new convenience retail floor space and 1,608 m2 of new comparison floor space in Petersfield Town Centre. Policy CP7 states that provision will be made for a limited amount of additional retail floor space in the town centre of Petersfield.	Reference the East Hampshire Local Plan correctly in the introductory paragraph, referring to the East Hampshire Joint Core Strategy. PTC will need to consider whether the PNP is appropriate in allocating no land for retail floor space given Policy CP7 which states that provision will be made for a limited amount of additional retail floorspace, totalling about 3,000 sq. m.
6.2	Retail Policy RPI resists the loss of retail space in the town centre. It also states that additional retail floor space should be provided in the town centre. Reference is made to new potential sites in section 11.2 of the plan. The policy considers the town centre boundary to be as that defined in saved policy TC1 from the East Hants Local Plan. This policy will be deleted on the adoption of the South Downs National Park Local Plan. These designations are very important in the consideration of new retail applications particularly for supermarkets. Retail Policy RPI also allows the provision of small scale convenience stores outside the town centre. It is not clear in the policy what would be considered 'small scale'	To choose between two options on the designation of the town centre boundary and primary shopping area in Petersfield Town Centre. Firstly, PTC could remove references to saved policy TC1, review Policy RPI itself and establish a new town centre boundary and primary shopping area. Alternatively the PNP could retain the town centre boundary and primary shopping area currently defined by saved policy TC1 and state that these designations will be reviewed and replaced by town centre policies set out in the South Downs Local Plan. Defines what is considered 'small scale' in reference to Retail Policy RPI. The definition of a small shop in the Sunday Trading Act (1994) is 280 square metres of net retail floor space. Alternatively a floor space limit of 150 square metres could be used which accords with the limit for changes of use under permitted development rights set by the Government in 2013.
6.3	Retail Policy RP2 deals with the mix and balance of retail uses. It proposes to use saved policies S2 and S4 from the East Hants Local Plan. These policies will be deleted on the adoption of the South Downs	To choose between two options for defining and designating the primary and secondary frontages which form the primary shopping area. These options are set out in section 6.2 in regard to the town centre boundary and the primary shopping area

	National Park Local Plan. The designation of primary and secondary frontages are very important in the consideration of new retail applications particularly supermarkets. It may also be useful to re-visit the policy test for non A1 uses in Petersfield Town Centre.	
Tourism Policies		
7.1	<p>The introduction to the tourism policies makes some reference to the SDNP designation; however there is limited reference to the second purpose of National Parks. There is an opportunity here to make a stronger case for developing tourism in the town in response to the SDNP designation. Policy TPI sets out a requirement for a new hotel but there is no specific allocation for this. If the allocation is to be provided in one of the mixed use town centre sites, this should be made clear in the PNP.</p> <p>There are two versions of Policy TPI in the document (see page 96). While the top version is more akin to a planning policy, the lower one reads as a description of the issue and is more appropriate for the written justification.</p>	<p>Consider including more detail and reference to the second purpose of National Parks to under-pin the community desire to make more of the town as a gate way to the National Park and a hub for tourism.</p> <p>Clarify whether a specific allocation will be made for the provision of a hotel in Petersfield.</p> <p>Replace lower policy with that at the top of the page and include a title only at the top.</p>
Sustainability Appraisal / Strategic Environmental Assessment		
8.1	There are concerns regarding the quantum of development proposed in the Petersfield Neighbourhood Plan. The EHJCS requires a minimum allocation of 700 dwellings, the PNP has identified allocations to deliver 701 dwellings. The SEA process is required to test alternative options to those proposed in the PNP. Therefore it is suggested that the SEA assess an alternative approach to delivering a quantum of housing above the 700.	While reasonable alternatives have been considered for the distribution of homes to meet the JCS target of a minimum of 700 new dwellings, it is arguable that, given the Inspector's wording a reasonable alternative would be to consider a quantum of housing above the 700 figure. Consider this option before submission.
8.2	Clarification is required in regard to the alternative options which have been assessed through the	Include a statement that explicitly links Option 2 to the relevant sections in Appendix D.

	Sustainability Appraisal / Strategic Environmental Assessment process. Specifically, the Option2, the 'Do Nothing' scenario has been assessed, inasmuch as Appendix D considers "The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex 1b to the SEA Directive) it is not clear in the text that this comprises the Option 2 Assessment.	
8.3	The assessment it is not concise or particularly accessible. There is too much information to be able to review in detail.	Review the format of the report with the aim of rationalising the information presented, avoidance of duplication and providing a clearer and more concise audit trail.