

# INDEPENDENT EXAMINATION OF THE PETERSFIELD NEIGHBOURHOOD PLAN SUBMISSION DRAFT 18 JANUARY 2015

## South Downs National Park Authority & Petersfield Town Council response to Initial Note from the Independent Examiner Christopher Lockhart-Mummery QC

### Introduction

1. The South Downs National Park Authority (SDNPA), the local planning authority, and Petersfield Town Council (the Qualifying Body, QB) appointed Christopher Lockhart-Mummery QC (Examiner) to conduct the independent examination of the Submission Draft of the Petersfield Neighbourhood Plan (PNP).
2. The Examiner published a note in which he stated his decision to hold a hearing and sought a response from the QB and SDNPA on a number of comments and queries.
3. The following responses are numbered to correspond with the examiners original note.

The Examiners questions are set in text boxes and the response by the QB and SDNPA follow each in turn.

### Comments on the PNP

6. I need clarification as to the precise extent of the statutory development plan. The principal element of the development plan, against which general conformity has been assessed, is the Joint Core Strategy 2014. There were, however, saved policies of the East Hampshire District Local Plan: Second Review which were not superseded by the adoption of the JCS. I need to know whether these policies have subsequently been superseded, and if so how.

- 6.1 There are a number of East Hampshire District Local Plan: Second Review policies which were not superseded by the adoption of the JCS. These policies have been passed to the examiner. Further information on the saved policies of the East Hampshire District Local Plan: Second Review can be found on their website

[http://www.easthants.gov.uk/ehdc/formsfordownload.nsf/0/4702D0537A44D62B80257E230040B27C/\\$File/Allocations+Plan+final+for+web.pdf](http://www.easthants.gov.uk/ehdc/formsfordownload.nsf/0/4702D0537A44D62B80257E230040B27C/$File/Allocations+Plan+final+for+web.pdf)), Appendix 15, page 75. A list of the saved policies is attached to this note, Appendix A.

7. The PNP is commendably clear (page 3) in attempting to distinguish its land use policies (in blue) from its “aspirational” policies (in pink). However, a Neighbourhood Development Plan “is a plan which sets out policies (however expressed) in relation to the development and use of land...”: Planning and Compulsory Purchase Act 2004, section 38A(2). PPG advises:

*“Neighbourhood planning can inspire local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex”.*

This preserves the potential for “aspirational” objectives or policies to form part of the PNP, and some Examiners have accepted this. Having regard to the fact that the PNP will form part of the section 38(6) development plan, I am nonetheless concerned at the intermingling, despite the colour-coded approach. I may recommend that the aspirational material be removed to a companion document or annex. Would there be strong objection to this, and if so why?

- 7.1 The Planning and Compulsory Purchase Act 2004, section 38A(2) and the PPG advises that actions dealing with non-land use matters should be clearly identifiable. The QB is content that the non-land use matters have been clearly identified as they are set out in pink in the PNP. The QB also suggests that the non-land use matters provide context for a number of land use matters. It is also important to the QB to demonstrate to the wider community that certain non-land use planning matters have been considered and are reflected in the PNP. However, if the non-land use matters are to be moved to an appendix the QB would request that the aspirational policies remain referenced in the introduction table to each

chapter which sets out the chapters objective and supporting policies. For example; on page 36 of the PNP the ‘pink’ aspirational policies will remain in the objective table, but the full text of the aspirational policies from page 43 and 44 would be removed from the chapter and placed in an appendix.

8. PNP page 9 – should the reference to “flats” be changed in the light of R25?

8.1 Representation R25 (East Hampshire District Council) has suggested that the reference to flats at section 3.1 (page 9), bullet point 6 should be amended to read ‘dwellings’. The QB and SDNPA agree to this proposed amendment, the revised text is as follows

*‘The demand for new affordable homes in Petersfield is between 32 and 74 per year. The majority of this demand is for one or two bedroom ~~flats~~ dwellings. We are currently unable to meet this demand. ‘*

9. HP5 “mandates” a phasing policy. My provisional view is that this does not conform to national guidance. Would it not be preferable to link development with the provision of necessary infrastructure (as suggested by R25)?

9.1 The QB and SDNPA have reviewed Housing Policy 5 (HP5) – Phasing of development on page 15 of the PNP. The underlying concern of the community was that development would outstrip the provision of supporting infrastructure. With this in mind it is agreed that the timing of development should be linked to the provision of the necessary infrastructure.

9.2 The following replacement policy is proposed:

**New Policy: Housing Policy 5 ( HP5) – Delivery of infrastructure**

a) New development will contribute towards new infrastructure or improve the capacity of existing infrastructure to mitigate its impact and support future residents and businesses.

b) Critical service and utility infrastructure will be provided on-site by the developer and utility providers to ensure development is properly serviced.

- c) In addition, a suitable package of supporting infrastructure will be negotiated by the National Park Authority in liaison with Petersfield Town Council and secured through legal agreements to ensure the development is acceptable in planning terms, self-supporting and its impacts are properly mitigated.
- d) On-site infrastructure will be secured through legal agreements based on the needs of each proposal (or group of proposals) and delivered directly by the developer or through financial contributions and/or land. Infrastructure delivery will be integrated with development phasing to ensure timely provision and commuted payments will secure necessary future maintenance.
- e) The design of infrastructure through partnership working with developers and infrastructure providers should reflect the high quality landscape and ensure, where possible, benefits to the economic and social well being of the local community.

Remove last paragraph of supporting text starting '~~Policy HP5 therefore mandates .....~~'

10. HP6 (affordable housing) is unclear as presently drafted. See R25 and R39. Please could a re-drafted version be supplied?

10.1 In response to the representations raised by East Hampshire District Council (R25) and South Downs National Park Authority (R39) the QB and SDNPA propose to amend the affordable housing policy HP6 at section 3.5.2 on page 16 of the PNP as follows:

**Housing Policy 6 (HP6) – Provide affordable housing**

- a) Proposals for new residential development that maximise the delivery of affordable housing and provide for the size, type and tenure of homes to meet local needs as set out in this policy will be permitted, provided they comply with other relevant policies. The application of this policy will maintain a focus on affordable housing, but will be sufficiently flexible to take account of viability and changing market conditions over time.
- b) A target of at least 40% of all net dwellings (C3 use class) on schemes of 6 or more units will be provided as affordable homes in perpetuity to meet local needs.

- c) Development of 11 or more net dwellings will provide affordable housing on-site unless in exceptional circumstances when the Planning Authority, at its discretion, may accept an alternative form of delivery in a cascade of forms with first preference for provision on an alternative site in Petersfield, then the provision of serviced land in lieu and then a financial contribution in lieu.
- d) Development of 6 to 10 net dwellings will provide affordable housing on-site where possible. Where on-site provision is not possible in whole or in part, commuted financial payments in lieu will be accepted.
- e) The layout and design of affordable housing will be appropriately integrated into each development so affordable housing is indistinguishable from the equivalent market housing. Affordable housing should be spread carefully through the development, not isolated in specific blocks.
- f) The size (number of bedrooms), type (flat, house, extra care etc.) and tenure (social and affordable rented, intermediate, shared ownership or other) of affordable homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through discussions between the applicant and South Downs National Park Authority in liaison with East Hampshire District Council, Petersfield Town Council, and Rural Housing Enablers where applicable.
- g) The eligibility for affordable housing will be administered by EHDC as the Housing Authority. The definition of local need is therefore as laid down by the Hampshire Home Choice service's Allocation Framework. However, priority will be given to people who can demonstrate a local connection to Petersfield in the first instance.

11. HP1 and HP7 envisage some 15% of the housing provision coming from self or custom build only. Many cogent representations are made relating to the delivery of this provision on this scale, and to the rigidity of the occupational criteria. Would a preferable approach be to allocate small sites for this purpose, or scatter the provision among allocated sites, as suggested by R35?

11.1 Why was this policy included?

11.1.1 After initially proposing that a self-build allocation could be included in the plan, the PNP group received universally supportive feedback from the community. One of the community's prime concerns was the affordability and provision of homes for local people. By linking self-build homes to a local connection policy, the PNP has therefore sought to directly address this concern. Self-build homes, by definition, are cheaper to build and restricting the market to local people will also reduce their future value.

11.1.2 The community was also keen to see high quality homes with beautiful architecture. Both these features are more likely to be seen when people build their own homes – self-built homes are very different from the products offered by volume house builders.

11.1.3 The community was also keen to see more energy saving and eco features – which are again a common theme in self-built homes. Finally, there is strong evidence to suggest that self-build homes result in better communities. *“If you build one house, you build yourself a home. If you build 50, you build a community.”<sup>1</sup>*

11.2 The local connection is too onerous, and how will it be enforced?

11.2.1 It is considered that the local connection is not too onerous. The policy sets out that an individual would only need to work or live in Petersfield (or surrounding areas) for 12 months before qualifying. The main intent is to prevent these sites being bought by people from further afield who may price out local residents. New text has been added to the policy to indicate that a review will take place after 5 years.

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<sup>1</sup> The Self Build Summit for Council Leaders

[http://www.local.gov.uk/c/document\\_library/get\\_file?uuid=40d9d0d6-f4df-4543-a47f-92fab35b959c&groupId=10180](http://www.local.gov.uk/c/document_library/get_file?uuid=40d9d0d6-f4df-4543-a47f-92fab35b959c&groupId=10180)

11.2.2 It is envisaged that the local connection requirements would be enacted as restrictive covenants on the deeds of each plot and thus enforced by the buyer/seller's solicitors as part of their normal business in the same way as an agricultural occupancy.

11.3 It is not viable as there is insufficient demand?

11.3.1 In terms of assessing demand, the QB followed the guidance from the National Custom and Self Build Association (NaCSBA) and:

- Set up a register of interest
- Used data from the NaCSBA national survey from the area
- Obtained local data from plot-search companies

11.3.2 This research showed a demand of up to 130 people actively looking for self-build plots right now. This would appear to demonstrate that 112 dwellings over the course of a 15 year plan was a modest proposal.

11.4 Why was such a large site (site H2) solely allocated as self-build?

11.4.1 Having decided to include a self build policy, the PNP Group looked at how this could be achieved. The option of requiring 5 to 10% self-build on each site was considered. However, the viability analysis (see Annex A of the plan) had already shown that our other policies, in conjunction with CIL, put development in Petersfield at the limit of viability. Another requirement such as self-build would therefore have potentially made development unviable and thus left the plan open to challenge. It was therefore decided to look for a different option.

11.4.2 Whilst the plan was being developed, the 16 acres of land to the north of Buckmore Farm (which forms the large majority of site H2) was for sale as agricultural land with a guide price of £250,000. As the site evaluation process progressed, it became evident that this site was unique in being the only major site which had passed all the evaluation tests (access, proximity to town centre, landscape etc) in line with the visions and concepts of the PNP but

had not previously been seriously considered for development. Thus there was no pre-existing interest from a developer, no option for purchase, and the fact that it was on the market at £250,000 demonstrated that it was both available and that the landowner was prepared to accept a value that could enable self-build on this scale.

11.4.3 It was therefore considered that this would be a viable site for self build. Whilst this might not result in the land value rising to that expected for residential development land, it would certainly raise the value of the land above its agricultural value, providing some return to the landowner.

11.4.4 It should be noted that the agent acting on behalf of the majority landowner of site H2 has made a representation during the submission of the PNP. This representation is coded as R28 Gentian Developments. The representation clearly states support for the self build / custom build model proposed for the site. The following statement was made as part of that representation '*Housing Policy 1 (HPI)* - Gentian supports the H2 site allocation involving the proposed allocation of land north of Buckmore Farm is wholly for the purpose of self-build or custom-build homes. Gentian is committed to exploring delivery options for the site with the town and national park authority.'

11.4.5 The other, much smaller part of H2 is owned by Hampshire County Council. Discussions with the Council indicated that, whilst they had concerns over deliverability, they had no other objection in principle. It was also considered that, as a local authority holding public land, the Council should be looking to support the Governments drive for self build and should therefore look favourably on providing low cost homes for local people.

11.5 Who will coordinate the delivery of the supporting infrastructure?

11.5.1 A number of representations contend that site H2 is not deliverable because it would be impossible to coordinate 101 self-builders to deliver the necessary infrastructure (roads, services etc).



11.5.2 The PNP group's vision was never that site H2 would be quickly sold off as individual plots, but that it would be first set out and supporting infrastructure put in place. This is effectively how large developments work as the companies that provide the roads and services are separate specialists from the companies that actually build the houses. Thus it is the intention that an enabling developer makes the site ready for development by individuals and then sells on the plots. This is a viable business model which is widespread in Europe and has also been proven in the UK, with developers such as Igloo pioneering the technique at a scale much larger than is proposed in Petersfield.

11.5.3 To clarify this intent it is proposed to amend the policy (please see end of this this section).

11.5.4 To aid the delivery of the largest self build site (H2) it is proposed that the Petersfield Town Council in liaison with the SDNPA, the landowner and the local community will prepare a design brief for the site, setting out key design principles and matters relating to landscaping, infrastructure, layout etc. This will be completed in 2016 in order not to delay the delivery of the allocation and text relating to this has been added to the supporting preamble to the policy.

11.6 What if it doesn't work?

11.6.1 The QB and SDNPA recognise that this is a new proposal for a neighbourhood plan. Whilst it is well supported by the community and should be successful, this can not be guaranteed. The PNP already notes in the preamble that there would be a 5-year review, but in order to provide greater certainty it is also proposed to reiterate this in the policy. Thus, for those that contest that the plan will deliver the required number of homes within its lifetime, it can be demonstrated that the allocation will deliver the homes even if the policy support for self-build is itself not successful.

11.7 How will the affordable element be delivered?

11.7.1 A number of comments questioned how the affordable element of this policy would be delivered. The PNP group's view has always been that self-build, when linked to a local connection will delivery lower cost homes for local people – which is the intent of an affordable housing policy.

11.7.2 However, it is clear that delivering 40% affordable housing (as defined by the NPPF) on a self build site would be complex. It is noted that the government has exempted self builders from a number of requirements (Para 144, Planning Policy Guidance) and it is therefore proposed that the requirement for affordable housing is removed.

11.8 The proposed revised policy wording is presented below.

#### **Housing Policy 7 (HP7)**

##### **Custom and Self-build Dwellings**

Sites H2 and H11, as shown in Table 1, are allocated wholly as self-build sites.

Subject to the application conforming with the appropriate site design brief in Section 12 of this Plan and meeting the requirements set out in other appropriate policies of this Plan as well as those within the East Hampshire District Local Plan: Joint Core Strategy:

a) Planning permission to 'set out' sites H2 and H11 as individual or collections of serviced plots together with the associated supporting infrastructure, will be granted,

b) Planning permission for either individual self-build or custom build dwellings on plots within sites H2 and H11 submitted by an individual, by a builder or a developer acting on behalf of an individual, or by a community group of individuals such as a Community Land Trust, will be considered favourably.

c) Planning permission for a self-build dwelling will only be granted for applicants who:

a. Demonstrate that they have a local connection (see below) and

b. Undertake in a section 106 agreement that the occupancy of the property will be restricted to people with a local connection in perpetuity and

c. Undertake in a section 106 agreement that they will live in the property as their main residence once it is complete and

d. Undertake in a section 106 agreement that once the development has commenced, they will complete the building of the dwelling within 2 years.

d) Petersfield Town Council will review this policy at 5 year intervals following the adoption of the PNP to determine whether it is delivering new dwellings as intended. If the allocated sites have:

i) been properly prepared

ii) robustly marketed at a fair market rate as individual serviced plots,

but are not being developed at the rate required to deliver the 112 dwellings within the lifetime of the plan, then the Council will consider reallocating these sites, or parts of these sites, as conventional residential developments. The review will also consider the success of otherwise of the related local connections policy.

## Continuation of Housing Policy 7 (HP7)

### Custom and Self-build Dwellings – Definition of Local Connection

For the purposes of this policy only, a local connection is classed as either being by Residency or by Employment and is defined as follows:

a. **Residency Qualification:**

- Have been resident in Petersfield or a qualifying parish for 12 continuous months at the time of application or
- Have lived in Petersfield or a qualifying parish for 3 out of previous 5 years or
- Have close family (mother, father, brother or sister, adult children or grandparent) who have been resident for 5 continuous years and continue to be resident in Petersfield or a qualifying parish.

b. **Employment Qualification.** An individual will be considered to have a local connection if he/she or his/her partner is in employment which meets all of the following criteria:

- The office or business establishment at which a person is based or from where their work is managed is within Petersfield or a qualifying parish and
- Is in paid employment and
- Works a minimum of 16 hours per week and
- Has been employed for a minimum of 12 continuous months at the time of their application and is currently in employment and
- Has a permanent or fixed term contract or is self-employed.

Qualifying parishes are: Colemore and Priors Dean, Hawkley, Greatham, Liss, Rogate, Harting, Buriton, Stroud, Langrish, East Meon, Steep, Froxfield and Sheet. These parishes are shown in **Error! Reference source not found.**

**Policy HP7 conforms with:** NPPF paras 50 and 159. JCS Policies CPI0 (Spatial Strategy for Housing), CPI I (Housing Tenure, Type and Mix), CPI3 (Affordable Housing on Residential Development Sites)

12. I am concerned at the highly prescriptive nature of HP8 and HP9. In addition, these policies would appear to be at odds with the ministerial statement dated 25 March 2015 on the new national technical standards, and the Technical Housing Standards dated March 2015. BEP4 is likewise very prescriptive.

12.1 Policies HP8 relates to the size of dwellings and HP9 considered matters of design and layout. BEP4 sets out design standards for shop fronts.

12.2 The supporting text to HP8 makes reference to the government's consultation on new nationwide housing standards. It states that should this policy be introduced then new homes in Petersfield should adhere to these new standards. This is now the case and there is clearly a need to update policy HP8 and the supporting text.

12.3 The QB & SDNPA propose that policy HP8 and the preceding 2 paragraphs be deleted and the following explanatory text inserted.

All new homes built in Petersfield will meet or exceed the national spaces standards as set out in the government's Technical housing standards – nationally described space standard paper or any subsequent revisions there after.

12.4 All subsequent policies within the Housing Chapter will be re-numbered as a result of the deletion of HP8.

12.5 Policy HP9 seeks to ensure that all new homes are built to a high standard of design and layout and uses the Building for Life assessment process to ensure that this happens. Building for Life 12 is a government-endorsed industry standard for well designed homes. It comprises 12 questions and uses a simple traffic light system to assess the positive or negative merits of the scheme.

12.6 The QB and Petersfield residents feel very strongly that the town is a special place, set within the South Downs National Park and that therefore the highest standards of design

should be strived for. However the Examiners concerns are recognised and the following amendments to Policy HP9 are proposed.

All applications for new homes shall include a Building for Life 12 assessment and proposals will be required to score 12 out of 12 'greens' expected to score positively (predominantly green) against the criteria. Only in exceptional circumstances, when all other options have been explored, will a red score be permitted.

12.7 New supporting text is also proposed

Further information on Building for Life 12 is available from [www.builtforlifehomes.org](http://www.builtforlifehomes.org).

12.8 BEP4 Shopfronts sets out a series of design principles that should be met. However it should be noted that this policy relates only to the Conservation Area. As such this policy is felt to be appropriate but it is proposed that the title be amended to specifically refer to conservation area (Shopfronts in Conservation Area).

13. I have a number of concerns as to the GAP policies. For example, how is GAP1 related to development, and deliverable? The same goes for GAP2, which also seems to propose obligations on the highway authority. Similar criticism can be made of GAP3 and GAP4. Is GAP6 a land use policy, or a request to the highway authority?

13.1 It is proposed to move GAP2, GAP3 and GAP 4 to an appendix and these policies to be reclassified as aspirational policies.

13.2 It is proposed to re-word the policy GAP1 to emphasise that it relates only to the development site, and is therefore is a valid land use policy. The 'prejudice' sentence from GAP2 has also been transferred to GAP1

### Getting Around Policy 1 (GAP1)

Provide pedestrian and cycle access to the Town Centre from new developments

New development shall provide for ease of accessibility for walking and cycling with routes through and within the development where appropriate that will facilitate access to the town centre, schools and adjacent residential areas. Wherever possible, the provision of pedestrian crossings and cycle routes related to a particular development shall be linked up to existing routes.

Development which would prejudice the implementation of these principles will not be permitted.

Where appropriate the design principles set out in Manual for Streets 1&2 with Shared Space street design shall be expected to be applied and wherever possible extended into the nearby areas.

- 13.3 GAP6 relates to the creation of an access to Festival Hall car park off Tor Way. The QB wish to ensure that any development of the site does not prejudice this. However to ensure that GAP6 is considered to be a land use policy the following re-wording is suggested.

Support will be given to a new access to the Festival Hall car park off Tor Way, including associated traffic calming measures to reduce traffic speed in Tor Way and associated adjustments at Moggs Mead. ~~Will be approved subject to the consent of the highway Authority to assist the Festival Hall car park to act as an interceptor car park for the town centre and also enable new development to take place on the north side of Heath Road to reinforce the street frontage and bridge the existing gap created by the west car park entrance. This will enable the adjustment of the cycle route along Tor way to provide direct access to the Festival hall and heather Road.~~

Any development applications for the Festival Hall area will be refused if they prejudice future abilities to achieve these revised access arrangements.

- 13.4 The remainder of the original policy will be moved to the supporting text as follows:

*'These improvements will be subject to the consent of the Highway Authority to assist the Festival Hall car park to act as an interceptor car park for the town centre and also enable new development to take place on the north side of Heath Road to reinforce the street frontage and bridge the existing gap created by the west car park entrance. This will enable the adjustment of the cycle route along Tor way to provide direct access to the Festival hall and heather Road.'*

## **Comments/queries on Representations**

15. R9 – please supply a red line location plan showing the land promoted.

15.1 A site plan has been included within the representation, a copy of which is attached, Appendix B. If further detail is required this will be provided by the representor.

17. R11 – can this allocation now be maintained, and if so why?

17.1 The QB strongly supports the continued allocation of this land within the PNP. The Frenchmans Road area is currently used as a car park and was identified through public consultation as an area which required regeneration and enhancement. Public feedback identified this area as being appropriate for business and employment uses, with a focus on regenerating the existing light industrial use to more office based use. This could include serviced office provision and a business centre. The close proximity to the train station meant this would be ideal for small business to access the new facilities.

17.2 The Environment Agency representation identifies this site as being within the flood zone further supporting the QB allocation of the land for employment uses rather than residential.

17.3 The inclusion of this site is a reflection of the QB desire to plan for the long term, reflect the views of the community and establish key principles for sites even if their immediate delivery is uncertain.

17.4 A small site of this size (0.10ha) is not fundamental to meeting the required provision of employment land as set out in the East Hampshire Joint Core Strategy.

18. A number of representors question the deliverability of a number of allocation sites, presently in use for other purposes. Example are H9, H10, MU1, MU2 etc. A brief response on such matters would be helpful.

18.1 The sites are considered in turn and a brief explanation in relation to their deliverability has been provided.

H9 – Hampshire County Council Depot off Paddock Way - Hampshire County Council Hampshire County Council Property Services Department have written to the Petersfield Neighbourhood Plan Project group acknowledging that the site (Hampshire County Council. Depot off Paddock Way) could become available within the Petersfield Neighbourhood Plan period. The letter also refers to alternative provision that would be available should the Depot site not be available in the plan period. The letter from Hampshire County Council can be found at Appendix C.

H10 – Community Centre Site - The Trustees of the Petersfield Community Centre submitted a representation to the PNP Pre Submission consultation. This representation makes the following point 'Provided these caveats remain part of the plan and are binding on any development proposals relating to the existing Community Centre site, I can have no reasonable objections to the plan as currently expressed. Indeed the expansion of the current centre, with more rooms for community use and with more car-parking space, has for many years been a long-term objective for the Community Association itself. The proposals in the plan provide a potential route to the achievement of that objective.'

This representation can be found at Appendix D. This clearly demonstrates that the site will be made available should alternative provision be identified.

MU1 – Royal Mail Sorting Office – The nature of the postal service is changing. Should it become available over the period of the plan, the community would support its redevelopment for housing and retail.



MU2 – BT Exchange – Considered by the community to be a significantly under-used premises.  
Should it become available over the period of the plan, the community would support its redevelopment for housing and retail.

H6-1 – Infant School South Site – Please see representation R51.

H6-2 – Site corner of Hylton road and Dragon Street – The site has been recently refurbished. It is therefore no longer available. The site was originally proposed for 4 homes which should now be removed from the overall figure for the town centre opportunities.

MU3 – Site West and South of Festival Hall – There was strong support from the community to see something happen on this prominent town centre site. Part of the work of the QB was to identify such key issues and establish the community's aspirations. To not include any consideration of the future of this site would have appeared an anomaly. However, it is well known that there are a number of land owners involved and as such the delivery of the redevelopment of this site could be more complicated. Consequently it is expected to come forward in the later part of the plan period.

MU4 – Site South of Station Road – A planning application (SDNP/15/00011/FUL - Clarendon Yard College Street Petersfield Hampshire) has been considered on this site. As such it is considered to be deliverable.

18.2 In summary it is the belief of the QB and SDNPA that these town centre sites represent development opportunities, but as with most such sites they can be more complicated and take longer to deliver. However, the community through the PNP is keen to establish the principles around the future of these sites for when they do become available, even if this is towards the end of the plan period, particularly where the most appropriate redevelopment is considered to be some form of mixed use proposals.

18.3 In addition to the comments made on the deliverability of each individual site within the town centre, the QB and SDNPA would like to highlight the delivery of housing anticipated

in the PNP. The QB and SDNPA feel this clearly demonstrates that the PNP will conform to the NPPF in that it has identified a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%. For the PNP this would result in a total requirement of 245 dwellings (233 homes plus a 5% buffer of 12 homes). This can be demonstrated as follows:

**2013 – 2018 (First 5 year PNP period)**

<b>Site</b>	<b>Number of homes</b>	<b>Current status</b>
Land at Causeway Farm (H1)	159	Pre Application stage, a revised site plan submitted as agreed by QB, Developer (R37) is attached, Appendix E
Penns Field (H3)	89	Pre Application stage. Previous application refused by SDNPA on design grounds.
Land South of Larcombe Road (H4)	71	Current application for 79 dwellings being considered by SDNPA. The proposal is for the site to be developed comprehensively alongside Land West of Causeway (H7). This may result in this site being completed in the period 2018 – 2023.
Land South East of the Causeway (H5)	71	Permission granted – currently under construction.
Site South of Station Road (MU4)	10	Town centre opportunity.
Total	<b>400</b> (329 should there be a delay in the delivery of H4)	

### 2018 – 2023 (Second 5 year PNP period)

The following sites are considered developable:

Site	Number of homes	Current status
Land North of Buckmore Farm and West of Bell Hill (H2)	50	Split 50:50 over the period 2018 - 2028
Land West of Causeway (H7)	64	Linked to the delivery of Land South of Larcombe Road (H4)
Land South of Durford Road (H8)	48	Pre-application discussions are taking place on this site.
Land at Bulmer House site off Rams Hill (H12)	40	Please see R35 for information on delivery.
Land North of Reservoir Lane (H11)	11	
Total	<b>213</b> (284 should H4 be delivered in this plan period)	

### 2023 – 2028 (Third 5 year PNP period)

The following sites are considered developable:

Site	Number of homes	Current status
Land North of Buckmore Farm and West of Bell Hill (H2)	51	Split 50:50 over the period 2018 - 2028
Royal Mail Sorting Office	5	

(MU1)		
BT Exchange (MU2)	11	
Infant School South Site (H6-I)	20	
Site West and South of Festival Hall (MU3)	12	
Hampshire County Council Depot off Paddock Way (H9)	42	
Existing Community Centre Site (H10)	10	
<b>Total</b>	<b>151</b>	

18.4 It is clearly the expectation of the QB that the plan will be reviewed in due course and that at this point the sites will be reviewed and if required the allocations will be revised.

19. R15 – is Southern Water correct in its assumption as to HP1? My understanding is that the design principles and the delivery considerations are intended to be mandatory.

19.1 The design principles and delivery considerations are intended to be mandatory. Housing Policy HPI (page 12) states that permission will be granted for new residential development on sites provided that the proposals conform to the design principles. Section 12.2 on page 94 clearly states that the layout plans are for illustrative purposes only whilst the design principles and considerations are mandatory. This text can be found in paragraph 4 of section 12.2. However for reasons of clarity, the QB & SDNPA propose to include the suggested text from Southern Water in Policy HPI and revise the policy as follows:

‘Planning permission will be granted for new residential development on the sites set out in Table 1 and, as detailed in Section 11, provided that the proposals conform to the design principles and delivery considerations set out in Section 12 and meet the requirements set

out in other appropriate policies of this Plan and the East Hampshire District Local Plan: Joint Core Strategy. Note that the site plans set out in Section 12 are illustrative and not mandatory.’

- 19.2 The QB and SDNPA also propose that specific reference be made to additional sewerage infrastructure requirements on the sites listed in Southern Waters representation, throughout Chapter 12.

20. R18 – a response to the Environment Agency representation is needed.

- 20.1 The Environment Agency representation identifies a number of sites (H1, Land at Causeway Farm, H3, Penns Field, H4, Land South of Larcombe Road, H7, Land West of the Causeway and B6, Employment Land @ Car Park off Frenchmans Road) where the site layout plans at Chapter 12 (Design Frameworks) allocate land in flood zone 2 and 3. It should be noted that the site layout plans are for illustrative purposes only as per text at paragraph 4 of section 12.2. However, revised site plans (H1, H4 and H7) have been prepared by the QB and are attached to this note (Appendix F) to provide more detail as to the extent of development. These plans now indicate more clearly that no development will occur in flood zone 2 or 3.

21. R28 – a response to the comment on BP1, would there not be merit in simply using the term “employment”?.

- 21.2 The QB & SDNPA agree that the term employment should replace business in Policy BP1. The proposed policy wording is as follows:

‘Planning permission will be granted for appropriate new ~~business~~ employment development on the sites set out in Table 12 and as detailed in Section 11, provided the development complies with the design principles set out in Section 12 and meet the requirements of other relevant policies of this Plan and the East Hampshire District Local Plan: Joint Core Strategy. Applications for alternative uses on these sites will not normally be approved except for those Town Centre sites shown in Table 13. ‘

22. R32/R33 – please supply a location plan of this site.

REPRESENTOR TO PROVIDE SITE PLAN

23. R34 – in relation to HP9, can these parking standards be maintained in the light of the 25 March 2015 policy statement?

23.1 Policy HP9 Housing Policy sets out parking standards for Petersfield. The Ministerial Statement of the 25<sup>th</sup> March relates to the need to ensure there is adequate parking provision both in new residential developments and around town centres. The thrust of the statement was concern about the imposition of maximum parking standards. The Statement states that Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.

23.2 It is therefore felt that Policy HP9 which sets minimum rather than maximum parking standards is not in conflict with this Statement.

24. R35 – is the MPA satisfied by the response at R39?

24.1 The Minerals Planning Authority for Petersfield area is SDNPA. SDNPA representation (R39) has set out text to be included in Delivery Considerations in section 12 of the PNP. Following Hampshire County Councils representation (R35) the SDNPA has amended the proposed text to take into account additional points highlighted in R35.

24.2 The following text is proposed to be added after the table to H1(12.4), H4 & H7(12.6), H5(12.7), H8(12.8) and B1 & H2(12.13) Delivery considerations:

Discussion should take place with the SDNPA prior to any specific development proposal to develop the site, to establish what mineral resource information (and the level of information) is required by the Mineral Planning Authority. It is recommended that in the event of a developer taking a development proposal forward which overlays safeguarded minerals resource that a Minerals Assessment Report is produced for the Mineral Planning Authority. It would be most beneficial to the developer if this was submitted to the South Downs National Park Authority prior to submission of any application to allow for early discussions to take place. The report should broadly address key issues including:

- Site setting – Location, access, site description, geology and constraints;
- Planning status in respect of minerals safeguarding
- Policy context (both national and local), Mineral safeguarding Area;
- Constraints upon prior extraction – inter alia previous mineral working, hydrology of area, utilities and market issues (viability and/or quantity of resource present).

24.3 The following text should be included at H4 (12.6), H8 (12.8) and B2(12.4):

Development proposals should ensure that the operation of waste infrastructure in the vicinity of the site is not prejudiced

25. R37 raises contentions as to the legal adequacy of the SEA in relation to the consideration of reasonable alternatives. A brief response would be helpful. If possible, this response might also respond to R43, contending that different options/distributions (southern/eastern focus, or dispersal) should have been tested. Additionally, please supply a location plan showing the intended enlargement of the H1 site.

25.1 Two representations have raised contentions as to the legal adequacy of the SEA prepared to support the Petersfield Neighbourhood Plan, the key points raised are:

- A contradiction between the QB statement of conformity which suggests there is no requirement for the PNP to prepare an SEA and a statement in the SDNPA Pre Submission

comments on the PNP (14 August 2014) which states that ‘a legal requirement for this neighbourhood plan (PNP) was to prepare a Strategic Environmental Assessment’

- Concern regarding the reasonable alternatives which have been tested through the SEA process. The SEA has assessed 2000 homes as a reasonable alternative to the proposals in the PNP, concern has been raised as to the reasonableness of this number and representations suggest that a lower number should have been tested as a reasonable alternative.

25.2 In the first instance, attention should be drawn to the development options which were considered for Petersfield under the East Hampshire Joint Core Strategy (June 2014). The SA of that plan published in Aug 2013 sets out the quantum of housing that was assessed for East Hampshire (See chapter 8 of that report). This figure was then broken down for Petersfield (see Table 8.1 of that report). This assessment explored a range of options for the quantum of development appropriate for Petersfield, it dismissed figures of 1,532 (option 2) and 2,477 (option 7) on landscape grounds (see Table 9.1 of that report)<sup>2</sup>.

25.3 Given that the SA for the East Hampshire Joint Core Strategy assessed a range of options for the growth of Petersfield, it was felt appropriate and proportionate for the PNP SEA/SA to test only a limited number of alternatives.

25.4 In initial discussions over the preparation of the PNP, the SDNPA confirmed with the QB that notwithstanding that the Joint Core Strategy had tested multiple amounts of development, an SEA would be required for the PNP due to the sensitive nature of planning in a protected landscape. It was felt that this approach would assist the QB in considering the alternative sites available at the time. The QB initiated the SA/SEA process and carried out a scoping exercise.

25.5 Through the preparation of the SA/SEA testing has taken place on the ‘do nothing’ option, 700, 768 and 2000 homes. The higher housing figure (2000) was derived from the Navigus

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<sup>2</sup> Given the length of this study a copy has not been attached to this response. A copy of this report can be made available to the Examiner separately if it is felt to be of use.



(2013) and CBA (2013) housing studies which suggested two different numbers for affordable housing demand in the town over the plan period. These were scaled up based on the assumption that affordable housing would comprise 40% of the overall housing delivery, which results in an overall housing figure range of 1,200 to 2,775 dwellings being required to meet the entire need. A midway point of around 2,000 dwellings was hence selected. It was considered that this approach had some logic for a settlement in a National Park as 'The English National Parks and the Broads Circular 2010' clearly states that 'the expectation is that new housing (in National Parks) will be focused on meeting affordable housing requirements'. Therefore the figure of 2000 homes was considered an alternative should Petersfield seek to meet its entire affordable housing need regardless of constraints and on the assumption that affordable housing only came through the development of market sites.

- 25.6 In preparing the PNP the QB presented a number of development options over a weekend in October 2013. The options presented were not intended to present alternative options for spatial distribution of housing for members of the public to choose their preference. They were instead intended to give the community an idea of how development could occur in Petersfield. They were not part of the SA / SEA process. The options weekend highlighted that the wider community supported the vision and objectives of the PNP, and there was support for the draft policies. The community feedback clearly supported a general approach to the development of smaller sites with access to the town centre.
- 25.7 Following the options weekend the QB drew together a list of all potential development sites. This list of 80 sites was passed to the SEA/SA consultants to carry out a high level assessment of all sites. This high level assessment tested all possible sites against a list of agreed criteria. Testing of all the sites available to the QB was considered to be proportionate in relation to testing the reasonable alternatives to the PNP.
- 25.8 Site HI - A revised location plan showing the intended enlargement of site HI (Land at Causeway Farm) can be found at Appendix E. This revised plan has been agreed by the Developer (R37), the QB and SDNPA.

26. R39 – is it intended to propose specific textual amendments to deal with these points, at this stage?

26.1 Yes, the QB & SDNPA has proposed textual amendments to deal with points raised. They are identified throughout. Underlined text – new wording, ~~Strikethrough text~~ – deleted wording.

## Appendix A. East Hampshire Local Plan Saved Policies

The following is a list of the saved policies from the East Hampshire District Local Plan

Policy C6 – Tree Preservation  
Policy C12 Equestrian uses  
Policy C13 Rural diversification  
Policy C14 Conversion of Buildings in the Countryside  
Policy HE2 Alterations and Extensions to Buildings  
Policy HE3 Advertisements  
Policy HE4 New Development in a Conservation Area  
Policy HE5 Alterations to a Building in a Conservation Area  
Policy HE6 Change of Use of a Building in a Conservation Area  
Policy HE7 Demolition in a Conservation Area  
Policy HE8 Development Affecting the Setting of a Conservation Area  
Policy HE9 Demolition of a Listed Building  
Policy HE10 Extension or Alteration of a Listed Building  
Policy HE11 Change of Use of a Listed Building  
Policy HE12 Development Affecting the Setting of a Listed Building  
Policy HE13 Buildings of Local Architectural, Historic or Townscape Interest  
Policy HE14 Under Utilisation of Historic Buildings  
Policy HE15 Commercial Frontages  
Policy HE16 Commercial Frontages  
Policy HE17 Archaeology and Ancient Monuments  
Policy HE18 Historic Parks and Gardens  
Policy HE19 Ancient Tracks and Lanes  
Policy T2 Public Transport Provision and Improvement  
Policy T3 Pedestrians and Cyclists  
Policy T4 Pedestrians and Cyclists  
Policy T5 New recreational footpaths  
Policy T7 Road schemes  
Policy T11 Road User Facilities  
Policy T13 Car Park allocations  
Policy T14 Servicing  
Policy E2 Renewable energy  
Policy P7 Contaminated land  
Policy H1 Baseline housing allocations  
Policy H2 housing reserve sites  
Policy H3 Residential Development Within Settlement Policy Boundaries  
Policy H6 Loss of Residential Accommodation  
Policy H7 Subdivision of Dwellings Outside Settlement Policy Boundaries  
Policy H8 Houses in Multiple Occupation  
Policy H9 Areas of Special Housing Character  
Policy H10 Special Housing Areas  
Policy H13 Accommodation for the Elderly and Rest and Nursing Homes  
Policy H14 Other Housing Outside Settlements Policy Boundaries  
Policy H15 Removal of Occupancy Conditions  
H16 Maintaining a Range of Dwelling Sizes Outside Settlement Policy Boundaries

H17 Mobile Homes  
IB4 Industrial and Business Land Allocations  
IB2 Industrial or Business Development Within Settlement Policy Boundaries  
IB3 Industrial and Business Development in the Countryside  
IB4 Retention of Industrial or Business Uses  
IB5 Lasham Airfield  
IB6 Special Industrial Estates  
TC2 Large Retail, Leisure and Entertainment Uses  
TC3 Development in Town and Village Centres and Retail Development  
S2 Non-Retail Uses in Shopping Centres  
S3 Primary Shopping Frontages  
S4 Secondary Shopping Frontages  
S5 Local and Village Shops  
S6 The Control of Shops on Farms  
S7 Garden Centres  
TM1 Tourism Development  
TM2 Visitor Accommodation Within Settlement Policy Boundaries  
TM3 Visitor Accommodation Outside Settlement Policy Boundaries  
TM4 Hotel Allocations  
TM5 Camping and Touring Caravan Sites  
TM6 Queen Elizabeth Country Park  
TM7 Conference Facilities  
MOD1 Buildings or Land Surplus to Requirements Within Settlement Policy Boundaries  
MOD2 Buildings or Land Surplus to Requirements Outside Settlement Policy Boundaries  
HC2 Provision of Facilities and Services with New Development  
HC3 Public Services, Community, Cultural, Leisure and Sports Facilities  
CF1 Community Facility Allocations  
PS1 Public Service Allocations  
PS2 Buildings or Land Surplus to Public Service Requirements  
LC1 Leisure and Cultural Facility Allocations  
RI1 Residential Educational Establishments  
CR1 Crematorium and Burial Space  
UI1 New Utility Infrastructure in the Countryside  
UI2 Reservoir  
UI3 Buildings or Land Surplus to the Requirements of Utility and Service Providers  
UI4 Telecommunications  
R1 Outdoor Sport and Recreation  
R4 Open Space Allocations  
R5 Recreation Facilities Requiring Extensive Areas of Land

Appendix B.



John Palmer  
Project Lead  
Petersfield Neighbourhood Plan Project Group  
c/o Petersfield Town Council  
Town Hall  
Heath Road, Petersfield, GU31 4EA

Enquiries to: Marta Bou Fernandez

Our ref: Y00509:

Tel: 01962 846181 (Fax - 846575)

Your ref:

Date: 26 May 2015

Email: [marta.fernandez@hants.gov.uk](mailto:marta.fernandez@hants.gov.uk)

Dear John,

## **Petersfield Neighbourhood Plan**

Following our meeting on 30 October 2014, I am writing to confirm the position in relation to Land off Paddock Way and Land at Buckmore Farm.

Regarding land off Paddock Way, as expressed in our earlier representations to the Petersfield Neighbourhood Plan, we note that the depot site off Paddock Way is identified as a potential location for housing; although it is currently fully operational and occupied by County Council Highways staff. The County Council acknowledges that the site could become available within the Petersfield Neighbourhood Plan period subject to Member approval and identification of a suitable alternative location for the existing use. I would also reaffirm that the County Council submitted to East Hants SHLAA exercise (2009) details of land to the south of Paddock Way which could provide a suitable alternative in the event that the depot site does not become available.

In relation to Land at Buckmore Farm, the County Council is supportive in principle to the provision of housing including self or custom build units on this site subject to Member approval, however, concerns remain regarding the delivery of such a scheme as contained in the draft Petersfield Neighbourhood Plan and the Council's opinion has been set out in earlier representations.

I trust this information is of assistance.

Yours sincerely,  
Marta.

Planner and Urban Designer

CC: Craig Hedges and Matthew James

## **Appendix D. Representation concerning the Petersfield Neighbourhood Plan**

The Petersfield Neighbourhood plan is an excellent document with a professional and comprehensive presentation that reflects well on both the town and on all those who have had a part in its development and production. I fully support the need for such a plan and intend to vote for its adoption at the referendum.

As Chairman of the Petersfield Community Association, I should declare a particular interest in those sections of the plan dealing with Housing and Community.

I note that the Delivery Considerations for Housing on H10, The Community Centre Site, include the statement that “The community centre facility MUST be provided elsewhere in order for this development to come forward”

I also note that Community Policy CP2 designates a site for a new Community Centre as part of the Love Lane Recreation Area and in CP3 it states that “New provision must be provided prior to the loss of existing provision” and that any such loss “will only be permitted where it can be demonstrated that alternative facilities of equal or better quality can be provided in an equally accessible location”.

Provided these caveats remain part of the plan and are binding on any development proposals relating to the existing Community Centre site, I can have no reasonable objections to the plan as currently expressed. Indeed the expansion of the current centre, with more rooms for community use and with more car-parking space, has for many years been a long-term objective for the Community Association itself. The proposals in the plan provide a potential route to the achievement of that objective.

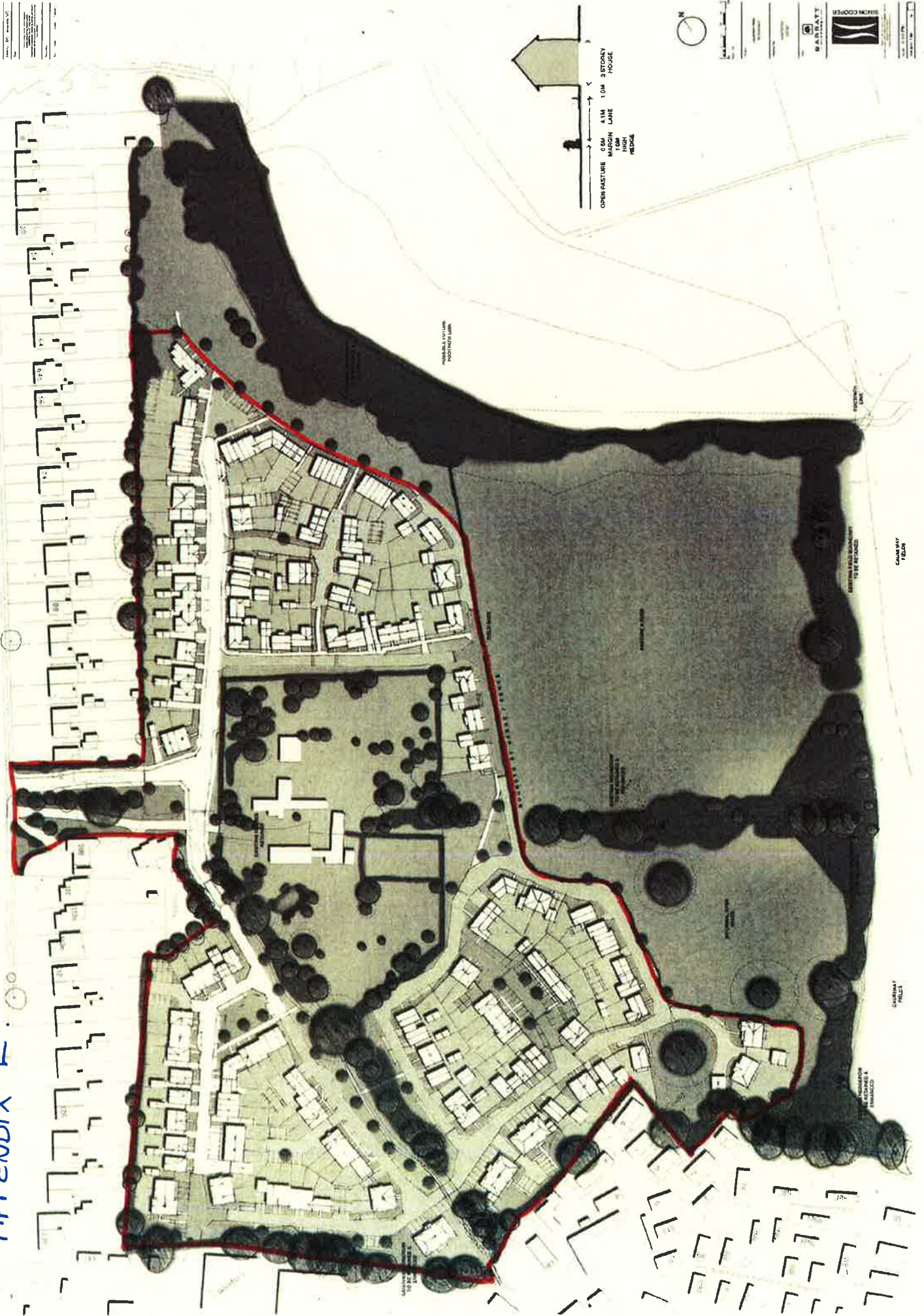
However, I believe that insufficient consideration may have been given to the financial viability of the proposals concerning H10, the Community Centre site. Any developer will presumably have to finance the building of the replacement community centre, either fully or in large part, and the cost of this will have to be recouped from the prices charged for the new dwellings. This could mean that the 10 planned dwellings (which it is suggested might be sheltered accommodation in the form of flats), could each be very costly and likely to be unaffordable by those who would benefit from any such accommodation.

The question of who owns and administers any new centre would also need resolution and agreement before the owners and trustees of the existing land and building could give their assent to any sale of the land and building, which are the property of the Petersfield Community Association, an independent registered charity.

L.Redstone 8 Upper Heyshott, Petersfield, GU31 4QA



APPENDIX F





**Appendix F. Revised site layout plans**

**Housing Sites H4/H7**

Revised housing blocking to show separation from flood zone 2 (pale blue/green) and flood zone 3 (darker blue).



**Original Layout**



**Revised Layout**

**Housing Site H1 (Northern Edge)**

Revised housing blocking to show separation from flood zone 2 (pale blue/green) and flood zone 3 (darker blue).



**Original Layout**



**Revised layout**