SDNPA response to Petworth Submission Neighbourhood Development Plan July 2017

All references to emerging South Downs Local Plan policies relate to the Pre-Submission Plan published on the 26 September 2017 rather than any subsequent revision (unless specified).

Comment number	Policy / para	Comment	Suggested change
		The progression of the PNDP to submission stage is to be welcomed and is a result of a considerable amount of hard work by the Town Council and volunteers.	
1	PP1 Settlement Boundary	In order to provide clarity as to what the 'exceptional circumstances' referred to might be, a reference to emerging South Downs Local Plan Policy SD25 Development Strategy would be helpful, particularly given the lack of any countryside policies within the neighbourhood plan.	Para 4.3 ……. Development outside the development boundary within the countryside will be strongly resisted <u>in accordance with the South Downs Local Plan (Development Strategy policy SD25).</u>
2	PP2 Core Planning Principles	PP2 (iii) makes reference to the historic core and existing focal points, some examples of what that means would help the interpretation of the policy. PP2 (iv) requires all development to be located within an acceptable walking distance……. This is not possible for those within the countryside and therefore it is expected that this refers to development proposals within the settlement boundary.	Include examples of what policy PP2 (iii) means within para 4.3. Clarify within policy or supporting text para 4.3 that this refers to development within the settlement boundary.
3	Policy H3: Housing type and Mix	This issue is dealt with by policy SD27 of the Pre-Submission Plan and therefore could result in duplication and confusion. It is not felt that policy H3 is necessary.	Remove policy
4	Policy H4 Affordable Housing	This issue is dealt with by policy SD28 of the Pre-Submission Plan. There are major differences between policies H4 and emerging policy SD28 with different quantums and thresholds being sought. It could result in the provision of less affordable	Remove policy

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	Provision	housing. In order to be in general conformity with the emerging Local Plan, whatever quantum and thresholds are finally agreed, it is strongly suggested that affordable housing policies be removed from the neighbourhood plan.	
5	5.23	Describes the sites as not being prominent in terms of landscape. This is not correct, site H7 is prominent and this reference should be removed.	Remove end of para 5.23.
6	Policy H5: Rotherlea	Para 5.28 seeks to phase the development of this site until completion of the new school road. There is a current application on the Rotherlea site and there are thought to be no highways objections. Therefore, although it would clearly relieve local issues more quickly, the requirement for occupation not to commence until the new road is completed may be inappropriate and artificially delay the delivery of housing.	Remove reference to phasing.
7	Illustrative Masterplan – Policy H5, H6, H7 and Appendix 2.	The status and weight to be afforded to this varies throughout the plan. In para 5.13 it is referred to as providing a potential layout but in policies H5, H6, H7 there is a requirement to demonstrate how the principles of the comprehensive masterplan have been taken into account. The Consultation statement (pg 20) states that '*the masterplan does not seek to fix development parameters or design detail. The purpose of the masterplan is simply to illustrate one option of how development on the sites could be comprehensively masterplanned*'. The SDNPA has many concerns (see comment 10) about the potential layout and design illustrated in Appendix 2 and would not wish this diagram to be considered as adopted policy. It is for illustrative purposes only. In addition it was originally accompanied by some written principles, which are no longer retained. We suggest a number of changes.	a) Remove the reference to masterplan in H5, H6, H7; and b) remove the illustrative masterplan (Appendix 2) and include a requirement in the policy that a masterplan be drawn up and agreed with relevant stakeholders prior to

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			submission of an application.
8	Policy H6: The Square Field	Parts (vi) and (x) are basically a duplication.	Delete (vi), retain (x)
9	5.29	Para 5.29 seeks to phase the development of this site until completion of the new school road within site H7. The NDP group understand that the development of H6 cannot progress until existing local traffic issues are relieved and certainly to progress without them would be unacceptable to local residents. Therefore if proven that his requirement is necessary for the delivery of the development its requirement should be in the policy and not the supporting text.	Add requirement for completion of new school road within H7, before occupation of homes in H6.
10	Policy H7: Petworth South	This is a site that the SDNPA has had some concerns about allocating for development due to its sensitivity in the landscape. However, it meets; many of the objectives of residents of Petworth, emerging policies of the South Downs Local Plan; and, extensive consultation underpins its allocation. The opportunity therefore needs to be grasped to improve the southern aspect of the town particularly given the views from higher ground to the south and east as well as from other key locations such as Lavington Park (Seaford College) which is a Grade 11* building set in a Grade 11 parkland, and provide the much wished for new access to the school which would improve existing adjoining residential areas. The detailed comments below seek to strengthen the policy and ensure it is deliverable: H7 vii and ix - We understand why the plan shows the entrance to the site to be to the south as the bank is not raised at this point. However, by locating it here, it has the effect of pushing the village entrance significantly further out into the open	Updates or additions to Policy H7 • A low key entrance to the site should be sought that reflects the character of its precise location on the A285. References in the policy (part ix) to a gateway should be removed as it may have unintended consequences and can

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		countryside. This is the location of a road access and roundabout previously sought by WSCC which drew strong objection by various bodies. This is also within the 60mph zone meaning that without a roundabout, a large visibility splay would need to be provided, both of which would be unsuitable. Therefore a reduction in speed limits is likely to be required and it might be better to have the site entrance further to the north, close to the main town, even if this does mean greater bank excavation (it would need a sensitive design). This may also allow the access road to then run through the north of the site, along a shorter distance and closer to the main noise and activity of the town. The more minor roads feeding off it to the south could have a more rural, minor feel. We feel it is important that the masterplan (Appendix 2, if retained) and site allocation boundary (Figure 4) should not prescribe the site entrance location at this point in time or allocate this small south-westerly parcel of land. Instead the policy could should give criteria on what any entrance needs to achieve. If ultimately the access does need to be further to the south, just outside of the allocation, this could be dealt with through the planning application process. Conversely, should this small area of land ultimately not be required for the access, we would not want it to be interpreted as being available for development. The illustrative masterplan (Appendix 2) indicates that the new dropping off place for school children is within the school grounds on what currently appears to be playground. Policy H7 does not include this land within the site boundary and therefore it is not clear from the policy that this is in the intention. In addition it raises questions about whether the lost playground needs to be replaced and if so, where to.	be interpreted to mean a high profile statement building or a number of urbanising features. • The site boundary be drawn to follow the current hedge line along the full extent of the southern edge of the site and not include the small south-westerly extension (currently identified on Appendix 2 as being for the access). Supporting text to explain that the precise location of the access to be determined following the consideration of the options available, including positioning it to the south of the allocation. • The policy should specify that the vehicular access should be as a spine through the centre of the development and not form the southern boundary in as far as is possible. • Clarify position of drop-off car park and resulting impact on playing fields. • The policy should state that the external edges of the development

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		Final paragraph of policy. Although earlier criteria have referred to landscape considerations, and this final para refers to minimalizing the visual impact through the design of the site layout, there is a potential for the development of this site to merely be a 21st century repetition current 20th Century squared-off boundary to the southern and western edges of the settlement. The policy should therefore include a specific design criterion stating that the external edges of the development should reflect traditional settlement edge in form ("organic" - not built up to the squared off boundaries of the existing field) and protect views of key landmarks. The SDNPA would wish to work with all relevant parties to develop a design brief for the site.	should reflect traditional settlement edge in form i.e. "organic" not built up to the squared off boundaries of the existing field. • The policy should require that the development is of a high quality and sustainable design which responds to the local landscape and doesn't introduce features of standard suburban developments such as windy roads and close-boarded fencing. • Point iii) – should say all boundaries as it is also important the hedging is retained to the west to keep a rural approach to the village. • Additional criteria that the design and layout of the development ensures that long distance views of the churches at Petworth and Tillington are protected.
11	Policies H5, H6, H7 and WS4	These policies seek to enhance amenity and ecology, including protecting green corridors. However, in response to the HRA screening statement criteria should be added requiring suitable bat survey work.	Add criteria requiring bat survey work to inform design and layout.
12	5.33	… 'relatively sensitive site' ….	'relatively' should be removed. It is a very sensitive site.
13	5.35	Density preferences- should this go in the policy?	Include density requirements in policy H7.
14	Policy ESD1: Character and	This policy is generic and could be more locally specific for example:	The policy be strengthened to incorporate more locally specific detail.

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	Design	• In terms of landscape character Petworth falls within the Low Weald, Sandy Arable Farmland and Greensand Hills character areas. Key features could be extracted and incorporated into the plan • What is the local character in terms of built design? • Are there particular hard and soft landscape treatments that might be most suitable?	See comment on ESD3 below.
15	Policy ESD2	Should this state that the density only relates to development within the settlement boundary?	
16	Policy ESD3 (Design and access statements)	The requirements of a design and access statement is not a matter than can be required by policy through a Neighbourhood Plan. However as set out above the design policy could be more detailed and set out criteria to which new development must respond.	Remove policy or convert to an informative / supporting text. The following wording is suggested as a starting point: *A Design and Access Statement is a concise report accompanying certain applications. It provides an opportunity for applicants to explain how the proposed development is a suitable response to the site and its setting, the criteria in ESD1 could form the basis of what should be considered.* Move many of the requirements / topics from Policy ESD3 and put them in ESD1.
17	Policy ESD7: Biodiversity and Trees	The emerging South Downs Local Plan includes policy SD11 on trees, woodland and hedgerows. This provides more detail.	Suggest removal of policy in relation to trees etc and reference to the South Downs Local Plan to avoid conflict and

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		It may be more appropriate for the policy to set out overarching aims i.e. that development does not harm the long term health and amenity value of trees which make an important contribution to the amenity and biodiversity value of the area. This is then usually achieved by asking for a survey which they can explain in the supporting text.	confusion.
18	WS1: Petworth Town Centre	Policy WS1 requires a retail impact assessment for all retail applications outside Petworth Town Centre.	Revise policy to require retail impact assessment for all retail applications over 150 m2 in accordance with the emerging Local Plan or set out criteria that development needs to meet i.e. must not harm the vitality of the town centre; that no town centre locations are available or appropriate; or, that there are other overriding community benefits etc.
19	Policy WS4 – Land East of Hampers Common Industrial Estate	We feel that this policy would benefit from more detail and the following comments below seek to strengthen it: • Screening can be a landscape impact in itself if it doesn't reflect local landscape character (patterns or features), therefore there needs to be more thought in relation to landscape effects of the proposed development. What other functions could this screening going to provide? Could there be innovative design solutions to both mitigate impacts and deliver multiple benefits, e.g. green walls adjacent to busy roads for example. • Should the policy include any specific floorspace estimates/requirements in order to ensure efficient use of land?	Add further detail to policy.

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		• What about materials, design, layout, public realm for workers etc? The existing buildings are single storey, do the new ones need to be as well?	
20	GA1 Parking Requirements	It is questioned as to whether the fairly demanding parking standards for 1 and 2 bedroom housing may inadvertently cut across the density and design consideration set down in ESD1 and 2. We consider there should there be some flexibility for proposals within the Town Centre Boundary particularly as a public car park is available nearby.	Suggest the policy could be clarified to: • Note that the standards set out incorporate both allocated and visitor (unallocated) parking • Include the need for the design of parking to integrate with the context. • In the case of 1 bed homes, round the parking up to the nearest whole number.
21	LW1: Community and leisure facilities	Policy is confusing. We believe it is essentially supporting the renewal, enhancement and provision of new facilities. It is also protecting existing sites, but it is very wordy and therefore not entirely clear.	Shorten and clarify policy.
22	LW2: Playing fields and sports facilities	It could help if these were more clearly identified on map/list	Map them
23	LW3: Assets of Community Value	This is not a planning policy. The designation of an ACV requires an application to Chichester District Council.	Remove or merge with LW1.
24	Appendix 1	Map key not visible.	
25	Appendix 2: Illustrative Masterplan	See comment number 7.	

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Errata			
A	Figure 1 (Map) Page 5	Inconsistency in how area outside of SDNP is shown – The map shades it light yellow (possibly fine cross-hatching), with dotted black outline, but the accompanying Key shows it unshaded with a yellow outline. Furthermore, Para 2.2 refers to it as a "hatched area"	
B	6.11	"Petworth Conservation Area Plan" – give document its full title (Petworth Conservation Area Appraisal and Management Plan)	
C	Para 7.8	First sentence does not make sense (should it read owes much "to" its history?)	
D	National Park references	Reference to the Park should be clear as to whether they mean Petworth Park or the National Park e.g. para 3.5.	
E	H7	Major Development – At the pre-submission consultation stage the SDNPA commented that the allocations to the south of Petworth might constitute major development (in line with paragraph 116 of the NPPF) and as a result further analysis would be required.	In the supporting text to H7 recognise that the proposals are significant in respect to the National Park and therefore any development should meet part 3 of South Downs Local Plan Policy SD3 or any subsequent revision.
F	Appendix 1.0	• Poor reproduction quality. I can't read any of the text below the map. • Key viewing corridors not identified in key. • Access road in different location to masterplan in Appendix 2. (See comment…..)	
G	Appendix 3.0	• 2. Horsham Road Cemetery – "although…but" – re-word • 4. Barton Lane Cemetery "It is a pre 1800 settlement" ?	

The Submission Petworth Neighbourhood Development Plan has been screened in relation to the Habitats Regulation Assessment. It has been screened. This screening opinion is currently with Natural England awaiting their comments. It will be forwarded to the Examiner as soon as possible.