

18 MAY 2017



Petworth Town Council

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 South Downs National Park Authority
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The Old Bakery
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 Petworth
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15th May 2017

Ref: Erection of 34 dwellings, access and parking (Reference SDNP/15/01862/FUL)
Land at Rotherlea, Dawtrey Road, Petworth

Dear Mr Ainslie,

The Pre-Submission Draft Petworth Neighbourhood Plan ("draft Petworth Neighbourhood Plan") was published for consultation on 3 April 2017. In accordance with paragraph 216 of the National Planning Policy Framework ("NPPF") the policies contained within the draft Petworth Neighbourhood Plan are a material consideration in determining planning applications within the designated Petworth Neighbourhood Plan Area. Given the draft Neighbourhood Plan is at the advanced Pre-Submission stage, decision-makers (the South Downs National Park Authority as local planning authority) must give great weight to the relevant policies within the draft Neighbourhood Plan. Accordingly, Petworth Town Council has therefore assessed planning application reference SDNP/15/01862/FUL for the Erection of 34 dwellings, access and parking ("the Proposed Development") at Land at Rotherlea, Dawtrey Road, Petworth ("the Application Site") against the relevant policies within the draft Petworth Neighbourhood Plan.

Principle of Development

Policies H1 and H5 allocate the Application Site for 23 residential dwellings. Whilst the principal of residential development on the Application Site is policy compliant and therefore supported, the 33 dwellings proposed are materially greater than supported by Policies H1 and H5.

Policy H5 requires development proposals on the Application Site to demonstrate how the principles of the comprehensive master plan for the allocated housing sites have been taken into account. A copy of the preliminary sketch Concept Master Plan for the allocated housing sites is included as Enclosure 1. Whilst this is an initial sketch, it clearly demonstrates the Neighbourhood Plan's intention for the Application Site and the adjoining Square Field allocation (Policy H6) to be comprehensively master planned to ensure the delivery of key policy aspects of the Neighbourhood Plan. Key policy aspects such as:

- (i) i.e. retention of the 'Old School Pond' (Policy ESD4)
- (ii) Provision of usable public green spaces (Policy ESD5)
- (iii) Creation of biodiversity corridors and networks (Policy EDD8)



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- (iv) Retention of Category A and C good quality trees (Policy ESD8)
- (v) Provision of sufficient car parking spaces (Policy GA1); and
- (vi) Provision of vehicular access from Dawtrey Road.

Housing Type and Mix

For both market and affordable housing, the draft Neighbourhood Plan sets out that there is a need for smaller 1-3 bed properties. To ensure new development meets local needs, Policy H3 provides an indicative market and affordable housing size and mix. Whilst this mix is indicative, development proposals are expected to align broadly with this mix unless local evidence is provided justifying an alternative mix.

As demonstrated within tables 1 and 2 below, the proposed housing mix has little regard to the Policy H3 indicative housing mix. Of particular concern, the proposed market housing mix provides significantly too many large 4+ bed family homes and an insufficient number of smaller 1-3 bed properties.

| Dwelling Size | Policy H3 Market Housing Mix | Proposed Dwelling Mix (Units) | Proposed Dwelling Mix (Percent) |
|---------------|------------------------------|-------------------------------|---------------------------------|
| 1-2 bed | 40% | 7 | 35% |
| 3-bed | 40% | 5 | 25% |
| 4+ bed | 20% | 8 | 40% |
| Total | 100% | 20 | 100% |

| Dwelling Size | Policy H3 Affordable Housing Mix | Proposed Dwelling Mix (Units) | Proposed Dwelling Mix (Percent) |
|---------------|----------------------------------|-------------------------------|---------------------------------|
| 1-bed | 35% | 1 | 8% |
| 2-bed | 35% | 6 | 46% |
| 3-bed | 25% | 5 | 38% |
| 4+ bed | 5% | 1 | 8% |
| Total | 100% | 13 | 100% |

Affordable housing delivery is a priority of the draft Neighbourhood Plan. Policy H4 seeks 40% on-site affordable housing provision. We calculate that the development proposes 39.4% on-site affordable housing. Without prejudice to the Town Council's other objections to the proposed development, in particular, the quantum of development proposed, a commuted off-site financial contribution should be sought for the 0.6% dwelling shortfall (or any resulting shortfall arising from an amended policy compliant proposal). The Proposed Development therefore conflicts with Policies H3 and H4.

Density

To ensure all new residential developments are in keeping with the existing density character of Petworth, Policy ESD2 sets a density range of between 25 and 35 dwellings per hectare ("dph"). Based on the Application Site area of 0.8 hectares this would equate to a density range of between 20 and 28 dwellings. However, Policy H1



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and H5 specifically allocate the site for 23 dwellings – a density of 29 dph (broadly the mid-point of the Policy ESD2 density range).

The submitted Design and Access Statement confirms that the Proposed Development is at a density of 41 dph. The Proposed Development is at a density significantly greater than the indicative 29 dph stipulated within Policy H1 and Policy H5. Furthermore, it is also considerably greater than the Policy ESD2 upper level of 35 dwellings per hectare.

The Proposed Development therefore conflicts with Policy ESD2.

Biodiversity and Trees

As set out within the draft Neighbourhood Plan the 'Old School Pond', located within the Application Site is a proposed Local Green Space. Policy ESD4 requires Local Green Spaces to be preserved and where possible enhanced. Furthermore, the NPPF (paragraph 78) states that Local Green Spaces should be afforded the same policy weight as the Green Belt i.e. significant protection. Policy ESD8 also states that development proposals that result in an adverse impact on the natural environment will not be permitted.

The Town Council considers the loss of the 'Old School Pond' as a result of the Proposed Development to be wholly unacceptable. Loss of the pond is also likely to result in an adverse impact on the natural environment.

Regrettably, by reference to the Extended Phase 1 Habitat Survey, submitted as part of the Proposed Development, the ecological and biodiversity loss cannot be fully understood. Of significant concern is the Extended Phase 1 Habitat Survey fails to refer to the existence of the 'Old School Pond' being located within the Application Site. This is an alarming omission, given the pond, which as demonstrated within the photographs (taken on 24th March 2017) included at Enclosure 2, is of a notable size. The submitted Habitat Survey is therefore clearly deficient and potentially in breach of UK and European environmental assessment regulations. The Habitat Survey cannot therefore be used as the basis for rational decision-making.

Policy ESD8 also seeks to protect existing trees within or adjoining a development site. The policy resists the loss of both good quality Category A and B trees. It is evident from the Arboricultural Impact Assessment submitted as part of the Proposed Development that a number of Category B good quality trees would be felled because of the Proposed Development.

It is accepted that the Proposed Development includes new tree planting. However, the Town Council is of the view that the loss of some, or all of these Category B good quality trees could be avoided if the quantum and density of the Proposed Development accorded with Policies H1, H5 and ESD2; and regard had been had, as required by Policy H5, to the comprehensive master plan for the allocated housing sites.

The Proposed Development therefore conflicts with Policies ESD4 and ESD8.



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Parking and Highways

To ensure sufficient car parking spaces are provided as part of new developments Policy GA1 sets out residential car parking standards. Based on the proposed quantum and mix of dwellings we calculate that 129 car parking spaces should be provided within the Application Site. By reference to the Design and Access Statement, it is evident that only 60 car parking spaces are proposed. A level of provision less than half of that required by Policy GA1.

The Proposed Development therefore conflicts with Policy GA1.

Conclusion and Recommendation

Until the above matters are resolved to the satisfaction of Petworth Town Council, the current development proposal should be **refused** by the South Downs National Park Authority.

We would welcome the opportunity to work with the South Downs National Park Authority and the applicant to resolve these outstanding issues.

In the interests of our local community, should the South Downs National Park Authority resolve to approve planning permission with one or more of the above objections outstanding, Petworth Town Council would seek the Secretary of State calls in the planning application.

Many thanks.

Yours sincerely,



Chris Kemp
Chairman

Enclosure 1: Petworth Housing Allocations Illustrative Master plan (March 2017)

Enclosure 2: Old School Pond Photographs (24th March 2017)

Draft Plan Consultation March-May 2017

Illustrative Masterplan

The preliminary Sketch Concept Masterplan illustrates an early Vision for discussion and how development south of Petworth could sit within the landscape. The following principles highlight some of the key qualities of the proposed development which could create an innovative and sustainable place, whilst delivering the amount of **new homes required by the National Park Authority.**

- 01 Gateway entrance and village green**
The main entrance into the development will be from Station Road. Here there is an opportunity to create a strong public gateway space as part of a new village green. This will be a space that helps embed the new road into the landscape, which could include hedges, trees and Sustainable Drainage System (SUDS) features.
- 02 New school access and drop off space**
The new primary avenue street will provide direct access to the existing school and create a new formal drop off space.
- 03 Greenway cycle links**
The site could incorporate safe cycle links through connected green corridors. This will enhance connectivity to the town centre and school to the north.
- 04 Leisure trail**
The green web of green space provide the opportunity for a number of circular walks and activity trails as part of the on site recreational component of the development.
- 05 Recreation**
The strong landscape structure could also incorporate a mix of amenity, including local and equipped areas of play, as well as informal and natural play spaces.
- 06 Green streets**
This internal road would be the primary tree lined route linking to the school from Station Road and also form part of the green network of the proposed development.
- 07 Green web**
New tree and hedge planting to help enhance existing corridors and create a green web of connected landscapes to enhance amenity and ecology, as well as retain views south towards the downland landscape.
- 08 Waterbodies**
Management of on site hydrology will be an important feature of the development. New SUDS features will be added as part of an overall water management strategy.
- 09 Pedestrian link to Station Road**
A new footpath link along the green corridors could connect down onto Station Road via a ramped cutting from the proposed open space and further sustainably connect the development to the town centre and provide existing residents access to the sites amenities.

- Indicative built form (housing + garages)
- Primary road
- Secondary roads
- Footpath and cycle links
- Existing vegetation
- Proposed vegetation
- SUDS
- Amenity open space
- Play area
- Parking (up to 30 spaces + bus turning area)









