**Major Development Assessment of the Petworth Site Allocations: Supplementary Note**

This paper has been prepared by the South Downs National Park Authority (SDNPA) to inform the examination of the Petworth Neighbourhood Development Plan (NDP) and its site allocations in regard to major development. It is based on work originally prepared by the consultancy Envision.

Paragraph 116 of the National Planning Policy Framework (NPPF) states that:

*“Planning permission should be refused for major developments in these designated areas [National Parks, the Broads, and AONBs] except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:*

* *The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
* *The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
* *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”*

The SDNPA has therefore considered whether:

1. any of the proposed allocations in the Petworth NDP are major development; and,
2. whether there are exceptional circumstances and it can be demonstrated to be in the public interest for such major development to take place .

The Petworth NDP proposes three residential development sites as follows:

* Rotherlea, Petworth (H5) - 23 dwellings, 0.7 ha
* The Square Field, Petworth (H6) - 30 dwellings, 1.3 ha
* Petworth South (H7) - 100 dwellings, 5.9 ha

The NPPF does not define major development. The National Park Authority has sought legal opinions on what constitutes major development. These opinions are that the definition of “major development” is based on whether, prima facie, the development might potentially have adverse impacts on a national park, rather than whether, after a careful and close assessment, it will have such adverse impacts. The following part of this note briefly sets out the thoughts of the SDNPA on whether the proposed allocations are major development or not.

Site H5 is not major development. The site, owing to the surrounding development and its disused urban character, has low landscape sensitivity. It is located within the existing settlement boundary. Any ecological and wildlife issues can be addressed through the development brief and planning application.

Site H6 is not major development. The site has medium landscape sensitivity, but is well concealed and screened in many places by existing trees. Any ecological, wildlife and heritage issues can be addressed through the development brief and planning application.

Site H7 is considered to be major development because of its high landscape sensitivity, its more open and exposed location and its scale. This site has therefore been considered further, as set out below, in order to ensure that future planning applications may be capable of meeting national and local policies on major development.

The parish of Petworth has, according to the 2011 Census, a population of 3,027 people.  Population projections by West Sussex County Council indicate that the population of Chichester District is likely to increase between 2011 and 2026 by 7%. This equates to an increase of 212 people or 100 dwellings by 2026 (given the District average household size of 2.11) in the parish of Petworth. However, within the context of a National Park this should not necessarily be translated directly into there being an exceptional need for housing.

There is clearly an acute affordability issue in Petworth and there is substantial demand for affordable housing. There are around 45-50 households on the housing register who have stated a local connection and the average house price in 2017 was over £600,000. There is local concern that with no future housing development, the population will become older and decrease, which will be detrimental to services and facilities as well as the town centre.

Sites H5 (Rotherlea) and H6 (Square Field) with a potential yield of 53 dwellings are likely to come forward for development in the next five years and are therefore able to meet immediate housing need including some affordable homes.  To meet need in the longer term opportunities at various locations adjoining the town were assessed as set out in the Petworth NDP Site Assessment (July 2017) <https://www.southdowns.gov.uk/wp-content/uploads/2017/08/SUBMISSION_Petworth_Site_Assessment.pdf>. With the exception of site H5, no further sites were identified within the town, which is heavily constrained and historic. To develop outside of the National Park would not address any of the local needs of the community or be in the public interest.

Paragraph 5.32 of the NDP explains that the development of H7 is ‘critical to the overall strategy for the Petworth Neighbourhood Development Plan.’  It is likely to be developed in the latter part of the plan period and should deliver a significant quantum of affordable homes.  It will also include a new access to Petworth School, which has local community support given the parking and traffic issues surrounding current peak times and will bring significant benefits to surrounding residential areas. It will help to soften the existing urban southern boundary to the town and provide opportunities for circular walks and recreational trails.

The policy approach towards the site set out in the NDP is landscape led, this is underpinned by the emerging South Downs Local Plan which takes the same approach. Any future development brief must consider key issues such as the retention of key views and vistas, the protection of key landscape features, potential detrimental effects on both ecology and heritage, building heights and highway, issues. Should the NDP policy ensure that a development brief adequately moderates the landscape impact it is considered that the site could pass the test for exceptional circumstances and it can be demonstrated to be in the public as set out in paragraph 116 of the NPPF.