

Planning Resolution Ltd
Thorncroft Manor
Thorncroft Drive
Leatherhead
Surrey
KT22 8JB

Our Ref: SDNP/19/03158/PRE
Contact Officer: David Easton
Tel. No.: 01730 819346

30 July 2021

Dear Planning Resolution Ltd

PRE-APPLICATION ADVICE

Applicant Name: Kitewood
Proposal: Residential development of Allocated Neighbourhood Plan Site H6 (The Square Field), for circa 45 dwellings (private and affordable)
Site Address: The Square Field, Dawtrey Road, Petworth, West Sussex, GU28 0EA

Thank you for your correspondence received 26 June 2019 seeking pre-application advice.

Executive Summary

The proposed layout is largely considered to be acceptable in terms of the general principles. However, concerns remain in regards to a number of matters which should be considered in greater detail. These matters are specifically the proximity of plots 14, 15, 16, 17, 18 and 19 to the southern boundary and the proposed flat above garage on the eastern boundary of the site.

Additional, concerns exist in regards to the proposed housing mix as well as the number of affordable units proposed on site. Currently the proposal would conflict with policies SD27 and SD28 of the South Downs Local Plan (SDLP). Therefore, consideration should be given to addressing these concerns either through the adoption of a policy compliant housing mix or providing adequate justified through the submission of appropriate evidence in support of any application.

Consideration should also be given to the provision of visitor parking to ensure that adequate additional parking provision is included within the scheme to address the loss of onstreet parking on Dawtrey Road as well as meeting the needs of visitors to the site. It is recommended that visitor parking is better located around the site to provide dedicated parking across the entire site as currently it is largely absent from the centre of the development. It is also worth noting that the parking provision falls short of the WSCC parking demand calculator and this should be discussed with WSCC as part of any additional pre-application discussions.

It has also been highlighted that currently no drainage strategy has been identified and it is strongly encourage that further consideration is given to this prior to any formal submission. The layout should reflect and incorporate the drainage needs of the site rather than the drainage being designed around the layout. The open space requirements of the development have been

South Downs National Park Authority, South Downs Centre, Midhurst, GU29 9DH
Tel: 01730 814810 Email: planning@southdowns.gov.uk

identified above and consideration should be given to how these can be met on site or evidence justifying the approach would need to be provided in support of any future application.

Planning Policy

This section outlines policies which are pertinent to the proposals. A comprehensive list of policies is included at Appendix 1 of this advice and the Local Plans should be read as a whole.

The Development Plan for which any proposals would currently be assessed against the South Downs Local Plan (SDLP) and both the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) are material planning considerations.

National Planning Guidance - The National Planning Policy Framework 2019:

Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF). The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 172 that great weight should be given to conserving landscape and scenic beauty in the national parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

Petworth Neighbourhood Plan - 2015 - 2033

The Petworth Neighbourhood Plan (PNP) was made on 12th July 2018 and as such forms part of the Development Plan in the determination of the application. The relevant policies contained within the PNP are considered to be;

- Policy PP1: Settlement Boundary
- Policy PP2: Core Planning Principles
- Policy H1: Allocate land for approximately 150 new homes
- Policy H3: Housing Type and Mix
- Policy H4: Affordable Housing Provision
- Policy H6: The Square Field
- Policy ESD1: Character and Design
- Policy ESD2: Housing density
- Policy ESD3: Requirements for a Design and Access Statement
- Policy ESD5: Public Open Spaces
- Policy ESD6: Landscape and Visual Impact
- Policy ESD7: Biodiversity and Trees
- Policy ESD8: Sustainable Design
- Policy GA1: Parking Requirements
- Policy GA2: Pedestrian and cycle movement
- Policy D1: Infrastructure Delivery

Planning Assessment

Principle

The development plan in the consideration of this development consists of the South Downs Local Plan (SDLP) and the Petworth Neighbourhood Plan (PNP).

The application site falls within the Settlement Boundary of Petworth as defined under policy SD25 and as such the proposed development would be in accordance with policy SD25(1) subject to accordance with parts (a) that development should be of an appropriate character and function of the settlement in its landscape context; (b) make the best use of suitable and available previously developed land and; (c) make efficient and appropriate use of land.

In this case the application site is allocated through the PNP under policy H6 which identifies that the residential development of the site for at least 30 residential dwellings is acceptable subject to the development being landscape-led and according with the additional limitations specified through the policy. In this case the policy states that development should;

- (i) Provide vehicular access from Dawtrey Road.
- (ii) Roads through the site should seek to have a design speed of 20mph.
- (iii) Make equal provision on the site's northern edge for any existing on-street car parking spaces within Dawtrey Road that are lost as a result of any development on the site.
- (iv) Seek to enhance amenity and ecology through protecting and maintaining existing green corridors and through the creation of new green corridors.
- (v) Deliver a planting and landscape strategy to minimise landscape impact along the sites eastern and southern boundary. The landscaping strategy should seek to retain the square edged character of the site and retain views towards the downland landscape.
- (vi) Seek to incorporate a strong landscape structure throughout the site that includes a mix of amenity spaces.

Given the established character of the locality and the allocation of the site through the PNP it is considered that the proposed residential development would accord with policy SD25(1)(a) of the SDLP. The land is currently undeveloped and as such would need to be considered against SD25(1)(c) and in this case the proposals seek to deliver 45 dwellings on the site exceeding the minimum requirement of 30 dwellings specified through policy H6 of the PNP. The application site has an area of approximately 1.3 hectares which results in a density of approximately 34 dwellings per hectares in accordance with the requirements of policy ESD2 of the PNP.

Therefore, in this case the proposed development is deemed to be acceptable in principle by virtue of its accordance with policy SD25(1) of the SDLP subject to the development according with all other relevant policies within the SDLP and the PNP as well as the requirements of Policy H6. This will be considered throughout the report.

Layout

The proposals have been the subject of significant discussion between the applicant and the Local Planning Authority (LPA) resulting in significant revisions during the life of the pre-application submission. The current layout as set out within the Response Document dated March 2021, has taken in to consideration the Authorities previous comments, setting out the details of how the proposal has sought to respond to the concerns raised by the LPA.

Despite these revisions some concerns remain in regards to specific elements of the development in regards to the proposed housing mix, affordable housing, parking provision and drainage which have been set out below. In terms of all other matters insofar as they relate to the layout some concerns exist in regards to the proposed development and its relationship with the southern boundary of the site. Specifically plots 14, 15, 16, 17, 18 and 19 which have their primary elevations adjacent to the mature tree planting in this location which could potentially create an uninviting space with limited natural surveillance. The detrimental impacts of this arrange is further exacerbated given the southern aspect of the dwellings and the impact that their proximity to the mature treeline will have upon future occupiers.

Consideration, should be given to setting the dwellings further from the southern boundary in order to enhance the relationship of the development with the southern boundary and the arrangement of these dwellings. This could be achieved through setting the dwellings further back from the southern boundary and incorporating some additional green space.

With the exception of this element of the proposal (and those identified below) the Authority are of the view that the proposed indicative layout has sought to address the concerns of the LPA and incorporate the recommendations and comments provided during the pre-application meetings on this proposal.

In terms of residential amenity for adjoining properties and future occupiers of the site it is considered that by virtue of the orientation and layout of the dwellings appear to avoid any unacceptable adverse overlooking impacts on the proposed development or the existing residential development surrounding the site. Similarly, it is considered that subject to the dwellings being of an appropriate scale the proposals would not result in any unacceptably adverse overbearing impacts and as such based upon the indicative and illustrative information provided the development would appear to accord with policy SD5 (1) (k) of the South Downs Local Plan.

It appears that the rear gardens to serve the dwellings are of sufficient depths and width so as to provide adequate private outdoor amenity space to meet the needs of future occupiers, in accordance with policy SD5 (1) (h) of the South Downs Local Plan.

Climate Change and Sustainable Construction

Policy SD48 of the South Downs Local Plan concerns climate change and the sustainable use of resources. The policy identifies that the authority will encourage all new development to incorporate sustainable design features and require all new development proposals to achieve the minimum standards of energy and water efficiency.

The Sustainable Construction supplementary planning document (SPD) has been adopted and is available online at <https://www.southdowns.gov.uk/wp-content/uploads/2020/08/Sustainable-Construction-SPD-FINAL-25-Aug-2020.pdf>.

The SPD identifies that the proposed development would constitute a large residential development (10 units or above) and establishes the Climate Change mitigation and adaptation measures which the South Downs National Park Authority will seek to secure in accordance with policy SD48.

In this case the measures sought would consist of energy efficiency CO2 reductions of 19%; a further on-site green energy CO2 reduction of 20%; at least 10% of units certified as passive house; EV charging points for all plots; use of greener materials and timber grown in Britain; and water use of no more than 110 litres. At least 10% of total roof area should be provided as green roofs with green walls where appropriate. In private gardens compost bins should be provided and a site waste management plan for the development with at least 50% by weight or volume of non-hazardous construction waste generated by the development should be diverted from landfill. Additional requirements concerning trees and SuDS can be found under Appendix 4 of the Sustainable Construction SPD.

The SPD also provides the requirements for design stage evidence which should be provided as part of any future application with construction stage evidence likely to be the subject of pre-commencement or occupation conditions.

Housing Mix and Affordable Housing

The application site proposes a development of 45 dwellings which in accordance with policy SD28 would generate a need of 22 dwellings (50%) should a lower proportion of affordable housing be proposed then it would be necessary to fully justify this through the submission of robust evidence to demonstrate constrained viability or other exceptional circumstances as identified through paragraph 7.57 of the SDLP. The revised layout shows a total of 18 affordable units which would equate to an under provision of 4 units and in the absence of viability evidence to justify this shortfall the proposal would conflict with policy SD28.

The most recent revision of the proposed development includes the following affordable housing mix for the proposed 18 units;

- 1 bedroom - 7 units (38.88%)
- 2 bedroom - 7 units (38.88%)
- 3 bedroom - 3 units (16.66%)

4 bedroom - 1 unit (5.55%)

In this case there is a conflict in regards to the affordable housing mix between policy H3 of the PNP and Policy SD27 of the SDLP. Therefore, in this case it will be necessary to apply the test from Section 38(5) of the Compulsory Purchase Act (2004) which states;

"If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document".

Despite this paragraph 7.39 identifies that where a made neighbourhood plan proposes an alternative housing mix based on robust local evidence, this should be used in place of policy SD27. However, policy H3 of the PNP is based upon the findings of the Strategic Housing Market Assessment (2015) (SHMA) whilst policy SD27 has taken into consideration the Housing and Economic Development Needs (2017) (HEDNA). Therefore, in this case as the HEDNA is the most up to date evidence and as such policy SD27 should take precedence in this case in accordance with paragraph 7.39 of the SDLP and Section 38(5) of the Compulsory Purchase Act (2004).

Therefore, in this case the proposed affordable housing mix based upon the provision of 22 dwellings would be as follows;

1 bedroom - 2 units (10%)
2 bedroom - 9 units (40%)
3 bedroom - 9 units (40%)
4 bedroom - 2 unit (10%)

The development should be amended to ensure the provision of 22 units in accordance with policy SD28 and a mix of units which accords with policy SD27 of the SDLP. A variation from a policy compliant mix of affordable units may be acceptable if justification is provided in support of the application to demonstrate how it meets local needs. Similarly, it may be a matter of planning balance should the mix deviate but secure the full 50% provision of affordable units.

In regards to the market housing mix no details on the mix proposed have been provided in support of the revised layout and as such it has not been possible to fully assess the proposals compliance with policy SD27. However, based upon the proposed 23 market units which the development should provide the following policy compliant mix would be anticipated;

1 bedroom - 8 units (35%)
2 bedroom - 8 units (35%)
3 bedroom - 6 units (25%)
4 bedroom - 1 unit (5%)

Again, as with the affordable units it is anticipated that the market housing mix will reflect the policy requirements of SD27 or if local needs suggests that an alternative mix more closely related to that identified through policy H3 of the PNP is appropriate then evidence should be provided to demonstrate this.

However, as it stands based upon the information available to the Local Planning Authority (LPA) the proposed affordable housing provision and mix of dwellings would conflict with policies SD27 and SD28 of the SDLP as well as policy H3 of the PNP and as such would likely result in the refusal of the application.

Highways and Parking

The indicative layout submitted in support of the application shows the site accessed via Dawtrey Road in accordance with policy H6(i) of the Petworth Neighbourhood Plan (PNP).

The pre-application submission was accompanied by a highways statement and was the subject of consultation with West Sussex County Council as Local Highway Authority (LHA). The LPA in

their response have advised that a more detailed access plan will need to be provided showing access dimensions and two opposing vehicles passing one another. However, it is identified that this information could be provided as part of the final Transport Statement (TS). The highway statement has also identified that it is intended for an Automatic Traffic Count (ATC) to be undertaken in order to ascertain vehicle speed and volume data.

In terms of capacity the applicant has provided capacity data in the form of the Trip Rate Information Computer System (TRICS) database. This information suggests that the site will generate 21 and 25 two-way vehicle trips during the morning and evening peak periods respectively. The LHA have identified that this increase in vehicular movements would not be expected to see a 'severe' increase in traffic. However, it was advised that the final TS should include a Traffic Impact Assessment of the key junctions and identify any potential mitigation on key junctions. The LHA also advised that any traffic impact assessment takes into account the additional traffic demands of the approved 2018 application for the neighbouring site (SDNP/15/01862/FUL).

In terms of parking arrangements the LHA have identified that the proposed development falls short of the requirements within the WSCC Parking Demand Calculator (PDC). The HS identifies that a total of 91 spaces will be provided whilst the WSCC PDC identifies a parking need of 107 spaces. Policy GA1 of the PNP relates to Parking Requirements and identifies a parking standards for all new residential development and assuming a policy compliant housing mix this is likely to equate to 92 allocated parking spaces. However, where there appears to be a significant absence is in regards to visitor parking provision.

Policy H6(iii) of the PNP identifies that any development of the site should *"make equal provision on the site's northern edge for any existing on-street car parking spaces within Dawtrey Road that are lost as a result of any development on the site.* The indicative site layout plan shows 4 no. visitor bays outside of the redline boundary with 2 no. visitor bays within the site boundary. Further survey work should be undertaken to ascertain the extent to which the highways works would result in a loss of on-street parking provision in order to demonstrate the proposals compliance with policy H6(iii) of the PNP.

Further visitor parking is located at the entrance to the site with further space situated on the eastern boundary of the site. The visitor parking provision within the development should be located to meet the needs of the entire development in order to minimise informal on-street parking. Further consideration should be given to visitor parking provision and how this can be better incorporated and distributed across the development.

It is strongly recommended that the applicant enter into formal pre-application discussions with the LHA prior to submitting a full planning application. The LHA currently operate a scheme of charging for detailed highways and transport pre-application advice. Further information on the charging schedule and procedure can be found on the WSCC website at the following address;

http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx

The applicant should also note that a number of representations have been made to the Authority in regards to the access arrangements for the proposed development. These have been summarised above but the full representations can be found on the South Downs National Park Authorities website.

Foul and Surface Water Drainage

No drainage details have been provided in support of the application and as such it is unclear if the scheme has been designed with attenuation and drainage features in mind to address the drainage needs of the development. It is noted that an attenuation basin is shown in the south-eastern corner of the site but it is unclear if this feature has been informed by any site analysis. The layout should be informed by the drainage strategy for the site and as such if this is not the

case it is strongly recommended that consideration be given to the drainage strategy prior to finalising the layout or progressing to the submission of a formal planning application.

Our Drainage Consultants have been consulted in regards to the proposed development and have advised that the site falls wholly within flood zone 1 (low risk) and have no evidence of the site being at significant flood risk. It has been advised that surface water drainage is dealt with in accordance with the hierarchy for surface water drainage, whereby the preference is infiltration to ground. A copy of their supplementary guidance notes and checklists have been provided and is available through the South Downs National Park website. Mapping has also indicated that the site falls within SPZ2 and that this will need to be considered when designing the surface water drainage strategy.

In the absence of detail it has not been possible to assess the proposal against policy SD50 of the South Downs Local Plan (SDLP) but consideration should be given to the policy requirements in the preparation of the surface water drainage strategy.

In regards to foul drainage Southern Water have been consulted and have advised that due to the size of the development capacity assessments will be required to determine if the existing sewerage system can accommodate the proposed development flows. It has also been advised that a formal application for a connection to the public foul and surface water sewer would need to be made by the applicant or the developer. Consideration should be given to early discussion with Southern Water to resolve these issues and avoid pre-commencement conditions. A summary of their comments can be found above or the consultation response can be seen in full on the South Downs National Park Authority website.

Open Space

Policy SD46 of the South Downs Local Plan (SDLP) identifies that residential development will be required to provide open space on site or within appropriate proximity of the site, in line with the National Park Authority's adopted standards as set out in Figure 7.6 of the SDLP. In this case whilst the application has included an indicative layout we do not have detailed population/occupancy figures for the proposed housing mix. Therefore, assuming an average occupancy rate of 2.2 (UK Census Data) this would result in a total population of 99 for the development.

Applying this population figure to the standards for Chichester set out within Figure 7.6 of the SDLP the development would generate the following demand for open space, sports and recreational facilities;

Amenity Greenspace - 495m²

Parks and Gardens - 1584m²

Outdoor Sports - 1584m²

Children/Teen Play - 297.5m²

In the absence of detailed information concerning the total open space provision for the development it has not been possible to assess the proposed development against the requirements of policy SD46. Therefore, any future application should set out why the open space provision accords with policy SD46 and meets the needs of future occupiers as well as the local area.

BIODIVERSITY AND ECOLOGY

Policy SD2 of the South Downs Local Plan identifies that development proposals will be supported where they have an overall positive impact on the natural environment to contribute goods and services.

Policy SD9 concerns biodiversity and geodiversity and identifies that development will be permitted when they conserve and enhance biodiversity and geodiversity. It is also identified that up-to-date ecological information should be provided which demonstrates that;

- o The development retains, protects and enhances features of biodiversity interest and ensure

appropriate and long term management;

- o Identify and incorporate opportunities for net gains in biodiversity;
- o Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance ecological networks;
- o Contribute to the protection, enhancement and management of biodiversity, for example by supporting the delivery of Green Infrastructure; and
- o Comply with the mitigation strategy as set out in national policy.

Policy SD45 of the South Downs Local Plan concerns Green Infrastructure (GI) and identifies that developments should maintain or enhance GI assets, links and wider network as well as providing new GI or improving existing green assets and green linkages, which should be integrated into the design of the development. SD45(3) identifies that development proposals which harm the GI network must incorporate measures that sufficiently mitigate or offset their effects.

The pre-application submission was supported by an Ecological Impact Assessment (February 2020) which concludes that the site supports a low population of grass snakes with adverse impacts on these ecological features identified and appropriate mitigation measures proposed. The mitigation measures include enhancements for bats through the installation of additional bat roosting features, with additional nesting features for birds and features to facilitate hedgehog access to the site. These features are identified as resulting in an overall net gain for biodiversity.

Given the age of this survey work updated surveys should be undertaken in support of any subsequent application and details plans setting out the enhancement measures should be provided. Subject to satisfactory information being provided it is likely that the proposed development would accord with policies SD9 of the SDLP.

Dark Night Skies

Policy SD8 of the South Downs Local Plan (SDLP) concerns dark night skies and identifies that development proposals will be permitted where they conserve and enhance the intrinsic quality of the dark night skies. The entire South Downs National Park is designated as a Dark Sky Reserve and is relevant to any proposal which involves the installation of external lighting and where the development may result in light spill from internal lighting.

In this case the application has not been accompanied by an external lighting strategy not have detailed plans of the dwellings been provided to allow the Local Planning Authority (LPA) to undertake an assessment of the impact of development on dark night skies. However, consideration should be given to the design of any external lighting to ensure that upward light spill is mitigated whilst consideration should be given to designing out roof lights from any proposals or ensuring that automated blackout blinds are included to mitigate upward light spill.

Consultations

Below is a summary of the consultation responses received. Please note that full comments can be found through the South Downs National Park website.

Drainage Engineer

Flood Risk: The site is wholly within flood zone 1 (low risk) and we have no further knowledge of the site being at significant flood risk.

Surface Water Drainage: This will need to be dealt with in accordance with the hierarchy for surface water drainage, whereby the preference is infiltrate to ground. We have attached a copy of our supplementary guidance notes and checklists which should assist the applicant in developing an acceptable proposal, should they pursue a full application.

Source Protection Zone: Our mapping indicates that this site falls within SPZ2; this will need to be

considered when designing the surface water drainage strategy.

Southern Water

- o Due to the size of the development capacity assessments will be required to determine if the existing sewerage system can accommodate the proposed development flows.
- o Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer.
- o It is the responsibility of the developer, to make a suitable provision for the disposal of surface water. Part H3 of the Building Regulations prioritises the means of surface water disposal in the order:
 - a) Adequate soakaway or infiltration system
 - b) Water course
 - c) Where neither of the above is practicable sewer
- o Due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer/s now deemed to be public could be crossing the above property.
- o Southern Water requires a formal application for a connection to the public water main to be made by the applicant or developer.
- o The proposed development would lie within a Source Protection Zone around one of Southern Water's public water supply sources as defined under the Environment Agency's Groundwater Protection Policy. Southern Water will rely on your consultations with the Environment Agency to ensure the protection of the public water supply source.

WSSC Highways

Background-The Local Highways Authority (LHA) has been consulted for pre-application advice in regard to the proposed development at Rotherlea Care Home. The site is located within Petworth. The site is currently a large field which has access from Littlecotre and Dawtrey Road. Both roads are 'D' class roads subject to a 30 mph speed limit. Dawtrey Road enters the A285 (Station Road) via a mini roundabout.

The LHA acknowledge that planning permission (SDNP/15/01862/FUL) was granted in November 2018 for the Rotherlea development adjacent to the site. The development consists of the erection of 34 dwellings, access and parking (including 38% affordable housing). The LHA did not raise an objection to these proposals.

The LHA would advise that the applicant enters into a full pre-application advice consultation with the LHA. We currently operate a scheme of charging for detailed highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure at the link below;

http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx

Comments-The applicant has provided a Highway Statement (HS) in support of the proposals. The LHA would advise that a Transport Statement (TS) is produced for the proposals.

The LHA has provided a review of the HS below:

Access - The proposals would involve an extension of the existing cul-de-sac that exists onto Littlecote. A more detailed plan of the access should be provided which will need to show access dimensions and two opposing vehicles passing one another. All this can be provided within the final TS. The HS states that a future TS would provide an Automatic Traffic Count (ATC) to ascertain vehicular speed and volume data.

Capacity- The applicant has provided capacity data in the form of the Trip Rate Information Computer System (TRICS) database. The trip generation exercise for the proposed development suggests that the site will generate 21 and 25 two-way vehicle trips during the morning and evening peak periods respectively. This increase in vehicular movements would not be expected to see a 'severe' increase in traffic. As stated within the summary of the HS the final TS should

include a Traffic Impact Assessment of the key junctions and identify any potential mitigation on key junctions. The LHA would also advise any assessment takes into account the additional traffic demands of the approved 2018 application SDNP/15/01862/FUL.

Parking- The proposals would fall short of the requirements within the WSCC Parking Demand Calculator (PDC). The HS suggests that a total of 91 spaces will be provided with the PDC outputs arriving at 107 spaces. The final TS should provide further clarity on parking and explore whether additional parking can be provided within the development or on-street.

Public Representations

Public representations have been submitted in regards to the proposal primarily in regards to access and parking provision on Littlecote and Dawtrey Road. These matters are identified through the sites allocation and as such it is expected that these matters will be fully explored and discussed with WSCC highways prior to any formal submission.

If you pursue a formal planning application please note that the requirements of the South Downs National Park Authority Local Validation List will apply with regard to the information required to be submitted. Further information is available at <https://www.southdowns.gov.uk/planning/making-an-application/local-validation-list/> .

It would be advisable to contact the Building Control department at your Local Authority to check if building regulation approval is required.

Please note that the advice contained within this letter constitutes an informal Officer's opinion and does not prejudice, nor is binding upon, any future decision taken by the South Downs National Park Authority.

Yours sincerely,

David Easton
Development Management Lead (Eastern Area)
For and on behalf of South Downs National Park

Appendix

National Park Purposes

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes.

Partnership Management Plan

The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications.

The following Policies and Outcomes are of particular relevance to this case:

National Planning Policy Framework (NPPF) and Circular 2010

Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued on 24 July 2018. The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 172 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.

Development Plan

The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with the NPPF.

The following policies of the **South Downs Local Plan** are relevant to this application:

- Core Policy SD2 - Ecosystems Services
- Strategic Policy SD4 - Landscape Character
- Strategic Policy SD5 - Design
- Strategic Policy SD6 - Safeguarding Views
- Strategic Policy SD8 - Dark Night Skies
- Strategic Policy SD9 - Biodiversity and Geodiversity
- Development Management Policy SD11 - Trees, Woodland and Hedgerows
- Strategic Policy SD12 - Historic Environment
- Development Management Policy SD21 - Public Realm, Highway Design and Public Art

- Development Management Policy SD22 - Parking Provision
- Strategic Policy SD25 - Development Strategy
- Strategic Policy SD26 - Supply of Homes
- Strategic Policy SD27 - Mix of Homes
- Strategic Policy SD28 - Affordable Homes
- Strategic Policy SD45 - Green Infrastructure
- Development Management Policy SD46 - Provision and Protection of Open Space, Sport and Recreational Facilities and Burial grounds / Cemeteries
- Strategic Policy SD48 - Climate Change and Sustainable Use of Resources
- Development Management Policy SD50 - Sustainable Drainage Systems

Other plans considered

- Petworth Neighbourhood Plan

End of Document