



Summary of Representations made on the Regulation 16 Submission version of the Petworth Neighbourhood Development Plan (PNDP)

1. This document provides a summary of the representations submitted in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012(as Amended) to the Petworth Neighbourhood Development Plan (PNDP). This document is produced in compliance with the Neighbourhood Plan (Referendum) Regulations 2012.
2. The South Downs National Park Authority (SDNPA) published the PNDP for consultation from 4 September to 16 October 2017 in accordance with Part 5 of the Neighbourhood Planning (General) Regulations 2012 (as Amended). Representations were submitted during the publicity period by 12 respondents. The representations were received from statutory consultees, individuals and other organisations.
3. Paper copies of the representations can be viewed on request at the South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH.
4. Set out below is a summary of the issues raised in the representations. The South Downs National Park Authority Representation can be seen in full on our website.

Reference	Name / Organisation	Method of submission	Summary of representation
R1.	Chichester District Council	Email	<ul style="list-style-type: none"> • Succinct, clear, well laid out document • Policy H3: Housing type and Mix deviates slightly from emerging South Downs Local Plan and should be amended to reflect this policy. • Policy H4 Affordable housing deviates slightly from emerging South Downs Local Plan and should be amended to reflect this policy. • Policy H5 and H6: Rotherlea and Square Field – evidence of commuting bats, master planning recommended to minimise impact. • Working and Shopping: Support • WS2 Visitor Economy should be broadened out to support accommodation other than a hotel.

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			<ul style="list-style-type: none"> • CDC suggest the car park is unlikely to be able to be reconfigured in order to increase capacity and the wording to should be amended. • Support GA3 to protect car parking at Pound Street car park
R2.	Colin Harris	Email	<ul style="list-style-type: none"> • Largely supportive of plan but consider site assessments and sustainability appraisal contain a number of errors which are detailed in the representation. • There is an active bat population to south of town and consider proposals may affect bat routes.
R3.	Environment Agency	Email	<ul style="list-style-type: none"> • Proposed allocations have been directed to area of lowest probability of flooding. • Cannot see how wastewater will be dealt with. Sites H5, H6 and H7 are located in a groundwater Source Protection Zones 2 and 3. Ideally, the sites would be connected to the mains foul sewer, feasibility should be discussed with Southern Water. An Environmental Permit may be required for treated effluent to ground or surface water. This position will not normally apply to surface water run-off via sustainable drainage systems and discharges from sewage treatment works operated by sewage undertakings with appropriate treatment and discharge controls. • Pleased with objectives used in Sustainability Appraisal.
R4.	Historic England	Email	<p>The Plan largely meets the basic conditions, with the possible exception of:</p> <ul style="list-style-type: none"> • there is no evidence of “an understanding and evaluation of its defining characteristics” of the Plan area as required by paragraph 58 of the National Planning Policy Framework to underpin Policy ESD I; and • there appears to be no evidence that the potential for archaeological remains has been considered with the three site allocations.
R5.	Leconfield Estate	Email	<ul style="list-style-type: none"> • The Estate fully support the aims, objectives and proposed outcomes of the PNDP.

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			<ul style="list-style-type: none"> • The development should be viewed as an opportunity. • Propose minor settlement boundary amendment at the Grain Drier Site and Mile Cottage to rectify cartographical error. • Suggest settlement boundary around Hampers Common is incorrect, alternative boundary is proposed. • Policy H7. Petworth South - allocation delivers lasting benefits for existing residents and improve the southern approaches to Petworth. • Accessing the site towards the north of its western boundary (with Station Road) would necessitate potentially significant earth works which might in themselves lead to an over-engineered solution therefore the proposed vehicular access was positioned further south where the level of the site matches the roadway. The proposed junction might be as a simple 'forked' junction enclosing a small area of green space. It is not considered that this would be an inappropriate feature at the southern entrance to the Town. It is clear to the Estate that any access to the development site would necessitate the relocation of the 30mph limit southwards – since the type of junction design needed for a 60mph road would be visually inappropriate. It is recognised that further engineering advice is and so it is important that the Plan be sufficiently flexible to permit a range of potential access solutions. • It is suggested that the policy wording should therefore be amended to allow the access into the proposed development from outside of the settlement boundary. • The SDNPA's suggested removal of the reference to 'gateway' is not accepted. There is no intention for any 'iconic' building at this point - instead to create a southerly approach to Petworth that helps to establish a new high quality character, is suitably 'of Petworth' and helps to slow traffic on entering the town – as recommended by the Alan Baxter Report that the PNDP Steering Group commissioned.

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			<ul style="list-style-type: none"> Concern about criterion xii of Policy H7, the proposed development already provides for a new link directly onto this existing footpath linking the development to Grove Lane. It is not therefore considered necessary to require a second footpath in the location. The proposed new footpath may join Grove Lane precisely at the same point as the existing field access. This access is regularly used by large agricultural machinery and a dual use would pose a potential danger to users.
R6.	National Grid	Email	There are no implications for National Grid Gas Distributions intermediate / High Pressure apparatus.
R7.	Natural England	Email	Subject to policy amendments set out on page 12 of HRA being made to the plan, it is agreed that it can be screened out from further HRA work.
R8.	SDNPA	Email	<p>Suggest minor wording changes to strengthen and clarify policies. Identify policies that duplicate those in the emerging South Downs Local Plan and suggest removal.</p> <p>Areas of main comment were:</p> <ul style="list-style-type: none"> Uncertainty over status and content of the masterplan referred to in the plan. Suggest reference to gateway entrance to site H7 be removed and site boundary to follow southern boundary and hedgerow. Further detailed points relating to design and layout. For all allocations add a criteria requiring bat survey work. Remove policy requiring Design and Access Statements as this is not something that can be required through a NDP. Recognise that the proposals are significant and any development will need to be considered against the major development policy in the South Downs Local Plan.

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R9.	Southern Water	Email	Recommend inclusion of policy supporting new and improved utility infrastructure.
R10.	Steven Lane	Email	Concerns about the limitation of the policies in relation to North Street and the issues with traffic and vehicles, including mounting the pavement, lack of provision for pedestrians etc.
R11.	Vail Williams	Email	<p>The plan fails the basic conditions because:</p> <ul style="list-style-type: none"> • It places a cap on development contrary to the NPPF • The requirement to deliver 150 homes has resulted in otherwise deliverable sites not being brought forward. • H7 Land South of Petworth will result in landscape harm. • Housing sites that have been selected are not the most sustainable or suitable. • The allocations are counter to the South Downs Strategic Housing Land Availability Assessment conclusions. • It is not demonstrated that the South of Petworth site would meet the tests associated with Major Development. • The Town Council has not considered reasonable alternatives.
R12	West Sussex County Council	Email	<p>The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network as a result of the proposed levels of development that cannot be mitigated to a satisfactory level.</p> <p>However, over the plan period, traffic conditions in some locations are likely to worsen due to the effects</p>

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			<p>of background traffic growth and as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.</p> <p>A list of suggested footpaths and cycle paths are suggested to help guide Petworth Town Council in the spending of CIL.</p> <p>A ½ FE expansion of the primary school in Petworth has been identified to be required. Reference in the Neighbourhood Plan to the need for additional school places in the local area would be welcomed.</p> <p>Policy H5, H6 and H7 – The access arrangements to the sites are subject to demonstration at the planning application stage that safe and suitable access can be designed. The principle of accesses onto Dawtrey and the A285 is acceptable. The application for policy H7 would need to be accompanied by a full Transport Assessment.</p> <p>The County Council as Lead Local Flood Authority has no flood risk concerns for these housing sites.</p> <p>Policy ESD3 – Rather than an Design and Access Statement, the County Council would look for the impact to be assessed through a standalone and proportional transport assessment</p> <p>Policies WS3 and WS4 - Based upon review of the updated Surface Water Flood Risk Map, both sites but WS4 in particular, are prone to surface water flooding and WS4 is also at risk from groundwater flooding, and has the potential to increase the runoff from the site to above existing greenfield rates. Any development of WS4 should be clearly conditioned so as to restrict flows to existing greenfield runoff rates so as not to increase stormwater flows to the tributary of the River Rother.</p> <p>Section 10 leading to Policy D1 identifies items to help guide any spending of CIL and/or S106 agreement contributions. No mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects. The County Council is working with the South Downs National Park and other Local Planning Authorities to develop a mechanism and establish appropriate governance arrangements to oversee the prioritisation.</p>

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			D1 –It's unlikely that CIL will be sort to fund maintenance of highways improvements. Highway improvements would be subject to a S278 Agreement, through which it may be necessary to seek maintenance provision and/or commuted sum payments.