

The Petersfield Society Comments on the Final Draft of the Petersfield Neighbourhood Plan

1. The Petersfield Society is pleased with the Petersfield Neighbourhood Plan (PNP) as approved by the South Downs National Park Authority (SDNPA) for submission to the Inspector. We are impressed with the care with which it has been prepared including the extensive involvement of the local community.

2. The Petersfield Society is a Civic Society. It is a registered charity run by volunteer trustees whose principal aim is to safeguard the future of Petersfield. We are the local, independent, environmental watchdog dedicated to enhancing the quality of life in Petersfield and its surrounding villages. We encourage good design and planning and oppose any proposals which fail to enrich the area. We have acknowledged expertise in planning matters: our Planning Panel comprises two Town Planners, two Architects, an Engineer and an Historian. The publication of our new book 'A Celebration of Petersfield: the Town and its People' is imminent.

3. The Society has been actively involved in the public consultation stages of the PNP's development including making a detailed written submission during the last public consultation. We fully support the PNP as now submitted, including its Vision for Petersfield.

4. We have also been involved in the development of the East Hampshire Joint Core Strategy (JCS) and consider that the PNP policies:

a. conform generally with the JCS strategic policies, particularly those concerning vision, strategy and housing numbers; and

b. have proper regard to national planning policies including those of the National Planning Policy Framework (NPPF).

5. We hold to the view that the PNP will contribute to the achievement of sustainable development in Petersfield.

6. The PNP used the Petersfield Town Design Statement (TDS) as the basis for many of its policies. The TDS was subject to extensive public consultation during its development and was adopted by the East Hampshire District Council (EHDC) before the inauguration of the SDNPA. The Petersfield Society is pleased to have made a major contribution to the development of the TDS.

7. PNP policies are also based upon reference to Petersfield's 2014 Conservation Area Appraisal and Management Plan (CAAMP) commissioned by the SDNPA. The Society was heavily involved in the preparation of the CAAMP and continues to be involved in its finalisation.

8. While supporting the PNP as a whole, the Society has a number of specific comments on some of its detail, as set out in the following paragraphs.

9. Our understanding is that the word 'landscape' covers townscape as well, that is to say, natural and built. The character of Petersfield is predicated on a rich and historic mix of private and public buildings and spaces, of streets, roads, alleyways, footpaths and waterways, of open and green spaces, of layouts based upon mediaeval burgrave plots, of two and three dimensional grain patterns. It is important, when considering Petersfield's future development, to recognise and appreciate the generators of this unique character. We believe the PNP does this and, in doing so, sets the framework for development.

10. We have been concerned to ensure that the PNP protects Petersfield's townscape, landscape and setting within the National Park, including the views into and out of the town from and of the South Downs and Hangers, and the green corridors extending into and throughout the town.

11. The Society took part in the Inquiry by Design day in March 2014. We agreed with the broad consensus established at this event as to the sites suitable for housing allocation. We agree with the allocations for housing in Policy H1. We also not only agree but stress the importance of phasing new development provided by Policy HP5. Further, we support the argument that no further development should be permitted outside the settlement policy boundary as provided by Policy BEP6 and Figure 5 in conformity with JCS Policy CP10.

12. The broad consensus reached at the Inquiry by Design specifically excluded development of the whole of the Causeway Farm site, acknowledging the adverse impact on views to the South Downs and the green corridor into Sussex Road and the town this would have. The Society has joined with other organisations, notably the CPRE, in opposing development of the whole of this site which has been the subject of several refusals by EHDC and SDNPA. These refusals have been upheld upon appeal, the latest referenced APP/Y9507/A/14/2217804 by Decision Letter dated 29Jan15. The PNP allocates solely the western part of the site, close by the existing built-up area, for a maximum of 159 dwellings (Allocation H1). Subject to compliance with the PNP Design Framework for the site, the Society supports this allocation in that it would protect the important views out to the South Downs from Footpath 37 and the sweep of countryside into the town, all in accordance with JCS Policies CP19 and CP20.

13. The PNP mandates that proposals for new housing on allocated sites will be expected to be of high standard of design, layout and construction which reflect Petersfield's character, identity and distinctive setting in the South Downs National Park all as set out in its Policy HP9. Further, PNP Policy BEP1 requires new housing development to respect the character, setting and quality of the town's built environment. PNP Policy NEP5 is additionally important in that it provides for new development affecting the setting of the town within its environment to make a positive contribution and ensure that the sensitivity of its landscape (and townscape) quality is recognised, respected and enhanced as required by JCS Policy CP29. In this regard, we have concerns that, unless the housing developments on the proposed allocations of Land South of Larcombe Road (H4) and Land West of the Causeway (H7) are carefully designed with a high standard of layout and built form, the views to and from the Hangers will be badly affected. Judicious use of hedgerows and field boundaries will be required to mitigate the impact.

14. The Society recognises the absolute need for a greater provision of affordable and social housing in the town for people with a local connection. We strongly support the provision for affordable and social housing set out in PNP Policy HP6 and for Self-Build Homes as provided by Policy HP7.

15. As we have already argued in paragraph 8 above, Petersfield has a unique character. This is formed not only by the rich variety of its layout of roads, pathways, open green spaces, gardens, and buildings but by its historic mixture of many fine examples of mediaeval, Georgian, Victorian, Arts and Crafts and Edwardian dwellings, public buildings, commercial and industrial premises. JCS Policy 27 Design requires new development to respect the character, identity and context of towns such as Petersfield and to be of exemplary standard with criteria establishing how it should make a positive contribution to its local distinctiveness and the setting and context of the National Park.

16. PNP Policy BEP1 goes further and sets additional criteria against which proposals can be measured and assessed so that the town's character is respected and enhanced. The policy provides that development will be expected to meet the highest standards of design and make a positive contribution to the character of Petersfield. Proposals must respect and enhance Petersfield's distinctive built character and its high quality countryside setting. Where innovative and contemporary designs are proposed, they must be complementary to their context.

17. Notwithstanding the clear provisions of both JCS and PNP on the matter of design, we are concerned that criteria should be understood in terms of the principles of good design, including of layout, landscape and townscape, covering scale, mass, proportion, colour, pattern, contrast,

emphasis, balance, context, harmony, rhythm, movement, unity, variety, and integrity. We are pleased, therefore, that PNP Policy BEP1 mandates that all proposals must conform to any design guidance or code issued by the South Downs National Park Authority (SDNPA) and should also consider using the 'Building in Context Toolkit' produced by English Heritage and CABE.

18. In that the historic core of Petersfield comprises a critical part of the town's character, we strongly support PNP provisions that new development - of any sort - must contribute positively to its conservation and enhancement as provided by Policy BEP2 in conformity with JCS Policy 30. Areas of special housing character should continue to be protected as provided by PNP Policy BEP5.

19. The addition of over 700 dwellings in and around the town will necessarily result in changes to Petersfield's grain, townscape, character and some reduction of green infrastructure. It is essential, therefore, that open spaces and green infrastructure are developed as provided in PNP Policy NEP1. It is particularly important that green space in and around the town is formally protected, enhanced and extended. Accordingly the Society supports the allocation of Local Green Spaces provided by PNP Policy NEP2 and Figure 7. The allocation of G2 Green Space East of Causeway Farm is essential as it holds particular local significance on account of its natural beauty in the setting of the town within the National Park. Allocation of Local Green Space conforms with NPPF paragraphs 76 and 77.

20. Petersfield is not just historic. It is a thriving market town set at the junction of the (old, now by-passed) A3 and A272 roads and on the Portsmouth to Waterloo railway line. Its central market Square hosts two regular weekly markets, a monthly Farmers' Market, Easter and Christmas and other special occasion markets and events. Many clubs and societies cover the range of arts, crafts, sciences, commerce and sports. Bedales, Churchers and The Petersfield School all contribute enormously to Petersfield's life as do its library, post office, banks, and museum. Its retail outlets are varied including local and national. We could go on to sing the praises of Petersfield as a fine town in which to live, work and play. All these activities make getting around Petersfield a particularly important part of forward planning.

21. The PNP covers getting around in its section 5. We agree with all Objectives and Policies. We are disappointed however, that, apart from one or two mentions of mobility scooters, accessibility, including suitable kerb crossings, parking bays, the adoption of Lifetime Homes standards, shop and transport facilities have not been given high enough importance. We note that the Town and Country Planning Association (TCPA) has recently expressed its disappointment that HMG's Infrastructure Bill has missed the opportunity to create a duty to put accessibility at the heart of place-making and to ensure it is at the front of decision makers' minds when preparing local plans.

22. Our previous submission argued that the PNP should cover more strongly the inclusion of disabled people, offering places to live that meet their needs and provide the highest levels of independence, choice and control over their daily lives by providing for and promoting accessible homes and neighbourhoods that welcome and include everyone. We believe the PNP has not - yet - raised the profile of and provision for disabled people sufficiently and we should wish this to be improved. The needs of disabled people should be expressed more strongly in PNP Section 5, its Objectives and Policies.

23. We note that the PNP expresses the wish that the various organisations responsible for transport and highways should work together to achieve an improved infrastructure and facilities. We wonder how this liaison and shared responsibility can be achieved to avoid the wish simply being a forlorn hope. There appears to be little liaison between the LPA and County Highways presently. Additionally, Highways does not appear to respond positively to the already published guidance on maintenance in Conservation Areas, that of Petersfield in particular. Little regard is presently given to the maintenance and renewal of, for instance, paving slabs, cobbles, sets, street lighting and parking bays, apart from a simple utilitarian approach including the removal of historic and heritage materials such as granite gutter channelling and kerbs, and the excessive and

inappropriate use of bitumen black top surfacing. There clearly needs to be a constructive conversation with County Highways - for the benefit of Petersfield - and we should like to see the PNP making this point more creatively and strongly.

Thank you for your time and attention.

The Petersfield Society. 16 March 2015.
