

Comments About the draft South Downs Local Plan (May 2026) submitted by PeCAN and The Petersfield Society

This note contains the comments about the draft South Downs Local Plan (May 2026) submitted by PeCAN and The Petersfield Society in their joint response to the consultation which took place over the period 12th May to 23rd June 2026.

This was the final (Regulation 19) consultation stage before the Local Plan is submitted for examination by a Planning Inspector in relation to the Plan's soundness and legal compliance. Information about the consultation can be found here: <https://southdowns-consult.objective.co.uk/kpse/event/1E2E78BD-DF08-462B-B19A-E778A68A57D7>

The draft Local Plan can be found here: <https://www.southdowns.gov.uk/planning-policy/new-south-downs-local-plan/south-downs-local-plan-proposed-submission-may-2026/>

PeCAN and The Petersfield Society submitted comments about the thirteen paragraphs, policies and site allocations. These are listed below together with the number of the page where the comment can be found.

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Respondents to the consultation were asked to address questions about the soundness and legal compliance of each paragraph, policy and site allocation. The set questions are shown in blue on the following pages and our responses are in black text. Some secondary questions have been omitted along with questions about the identity of the respondent. The comments are arranged in the order that the relevant paragraph, policy or site allocation appears in the Local Plan.

1 Paragraph 1.7: The National Context

This paragraph can be found on Page 3 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

☐

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

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(3) Not effective

☐

(4) Not consistent with national policy

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3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

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4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

The draft SDNPA Local Plan has been prepared and submitted for examination under NPPF 2024. Revisions to the NPPF are currently being prepared, following a MHCLG consultation ending in March 2026. We do not know what changes or transitional arrangements there will be to the next edition of NPPF but assume that the inspector will use NPPF 2024 when assessing the soundness of the current Plan.

As an environmental charity, we are pleased that previous updates to the NPPF have tended to increase the attention and urgency given to climate and nature issues. This reflects growing awareness of the seriousness of the climate and nature crises as well as national policy targets including the UK's legally binding 2050 Net Zero target (Climate Change Act 2008), the UK's legally binding environment and nature targets (Environment Act 2021) and the UK's commitment to "30by30" biodiversity targets, currently being integrated into the Environmental Improvement Plan. These are important long-term policy goals, running over decades, that address even longer-term problems.

In pursuit of housing targets, the MHCLG's consultation text included some proposals that could potentially weaken environmental protections, for example around transport, water and sustainable construction (e.g. the proposed PM13). We hope that a sustainable balance can be found between environmental and housing objectives and urge the inspector, as far as possible, to interpret NPPF requirements in a way that reflects the government's long-term goals on climate and nature.

2 Policy SDN8: Trees, Woodland, Hedgerows & Scrub

This policy can be found on Page 62 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

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The statement about the Purpose of Policy SDN8 should be modified so that it is more consistent with national policy and for clarity. As currently written, this statement focuses on the contribution by trees, woodlands, hedgerows and scrub to “landscape and biodiversity” but it ignores the vital and more basic ecosystem goods and services, including place making and livability that these landscape components provide for residents and visitors to the National Park. The need to factor in the human as well as the ‘natural’ dimension in tree and woodland management is paramount and are well recognised by national Government in NPPF (Dec 2024) Paragraph 187 b) and in the UK Forestry Standard (<https://www.gov.uk/government/publications/the-uk-forestry-standard>).

The first paragraph on headed “Local Plan Objectives” on Page 62 makes reference to “regenerative development design principles” but these are not spelt out, or elaborated sufficiently in the document such that these principles can be used unambiguously when planning development in the National Park, or in the particular management of trees, woodlands, hedgerows and scrub. In the interest of clarity, such a term should not be used liberally without further reference to where it can be shown to apply to such management.

Paragraph 8 of Policy SDN8 is unsound because it is not consistent with National Policy. It makes reference to the “use (of) native (tree) species where appropriate” but this runs counter to national government policy as set out in Natural England Technical Information Note TIN053 (<https://publications.naturalengland.org.uk/file/92007>) UK Forestry Standard Practice Guide Adapting forest and woodland management to the changing climate

(<https://cdn.forestresearch.gov.uk/2022/05/UKFSPG026.pdf>) which recognise the importance of including “new native” and non-native species, in addition to native species, in order to build diversity and resilience to tree populations in the face of climate change and the significant risk of tree pests and pathogens which can decimate native species (e.g. elm and ash).

Paragraph 4.116 of the supporting text (on Page 64) is inconsistent with national policy. The last sentence of this paragraph refers to the use of so-called ‘biodegradable tree tubes’. This is unsound, premature and inconsistent with the sources of guidance which are listed below. The term ‘biodegradable’ can be misleading as it does not refer to how long the material will break down and biodegradable materials are not necessarily compostable. The evidence for this has been set out in several places:

- The Forest Plastics Working Group, (<https://www.forestplasticsworkinggroup.co.uk/s/The-sustainability-of-unconventional-plastic-tree-shelters-and-guards.pdf>).
- Forest Research is currently funded by Defra to evaluate the claims made by manufacturers of such equipment (<https://www.forestresearch.gov.uk/research/alternatives-to-conventional-plastic-treeshelters/>)

Current government policy is to encourage recycling of **all** tree shelters (including those based on bio-polymers) (<https://cdn.forestresearch.gov.uk/2023/10/The-UK-Forestry-Standard.pdf>). The last sentence of the Supporting Text not consistent with government policy and should be modified.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

The statement about the Purpose of the Policy (SDN8) should be replaced with the following version:

“The purpose of this policy is to ensure the management of trees, woodlands, hedgerows, and scrub (where scrub makes a positive contribution to landscape and biodiversity), in ways that maintain their biodiversity, productivity, regeneration capacity and vitality, and their potential to fulfil ecological, economic and social functions for residents and visitors to the National Park. It also seeks to ensure that opportunities for restoration and establishment of new trees, woodland, hedgerow and scrub is realised to support nature recovery and local character.”

The following paragraph about regenerative design principles should be added to the supporting text:

“Regenerative design principles should be fully compliant with established modern UK-wide government policy on woodland management (e.g. The UK Forestry Standard; <https://cdn.forestresearch.gov.uk/2023/10/The-UK-Forestry-Standard.pdf>), and any deviations from it (a) should be backed by evidence whose quality is defined by established peer approval processes such as publication in high quality scientific journals, and (b) approved by government forestry department authority.”

Paragraph 8 of Policy SDN8 should be modified so that the second sentence reads as follows”

Establishment of new planting, including species selection and design, should be suitable for

the site conditions, and those predicted to occur in the future due to climate change, use native and non-native species where appropriate, contribute to climate change adaptation, be informed by and contribute to local character and the historic environment, and enhance or create new habitat linkages.”

Paragraph 4.116 in the supporting text should be modified so the last sentence is as follows:

“Pest protection for newly planted trees ~~planting~~ should be removed from the site and recycled when redundant~~biodegradable fencing, poles, tree tubes. — left plastic material is a hazard for people and nature.~~”

3 Policy SDN9: Sustainable Construction

This policy can be found on Page 65 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

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We consider this policy to be justified, effective and consistent with national policy.

The policy aims to reduce GHG emissions through energy efficiency measures (SDN9.1) and embodied carbon (SDN9.2). We do not address water consumption (SDN9.3) in this comment.

A useful recent precedent is the Winchester District Local Plan, which was approved under NPPF 2023 by the Planning Inspector on 09 March 2026 (Report on the Examination of the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040). The Winchester District Local Plan contains a Policy CN3 which is more stringent than the proposed SDN9.1 in terms of space heating and total energy demand for new residential development and was approved under NPPF 2023. The text in the relevant paragraph of NPPF 2023 is unchanged in NPPF 2024 (cf 2023 159(b) and 2024 164(b)). The Winchester plan also contains a Policy CN8 that implements similar objectives as SDN9.2 on reducing embodied carbon.

CONSISTENT WITH NATIONAL POLICY

The aims of SDN9.1 and SDN9.2 are to reduce GHG emissions overall to net zero by 2050 (Climate Change Act 2008), including through lower buildings emissions. NPPF 2024 paragraph 164(b) says that new development should help to reduce greenhouse gas emissions, including through design, as long as local requirements reflect the Government's policy for national technical standards. National policy on lowering building emissions is to ensure high levels of energy efficiency, so that new buildings will not require retrofitting to become zero carbon as the electricity grid decarbonises (see Future Homes and Buildings Standards: Building Circular 01/2026). The technical standards to implement this include amendments to the Building Regulations 2010 that require "the minimisation of greenhouse gas emissions from buildings - by limiting heat gains and losses" (Schedule 1, L1). We

consider that by setting robust but achievable goals for operational and embodied emissions, SDN9 is consistent with and supports this national policy, as well as being in line with the goals of the SDNPA's new Partnership Management Plan. In addition, GHG emissions from households in the SDNP are around 27% higher than for an average UK resident. This makes it even more important for new builds in the National Park area to have good levels of energy efficiency to prevent the Park's overall housing stock from undermining the national target.

JUSTIFIED AND EFFECTIVE

In terms of being justified and effective, we look at SDN9.1 and SDN9.2 separately.

SDN9.1 concerns energy efficiency standards.

Higher energy efficiency standards in new buildings are commercially feasible and popular with purchasers who benefit from lower running costs. The target space heating requirement demand of <20 kWh/m² is achievable at a financially viable cost. According to a study for the Climate Change Committee that predates the Future Homes Standard, a more stringent standard of <15 kWh/m² including air source heat pump would cost an additional £4,800 per new build home, versus £26,300 to achieve by retrofit (Climate Change Committee, "UK housing: Fit for the future?", Feb 2019, table 1.1 <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>). A subsequent 2022 government report, "Building for 2050", found that "In well-planned, well-constructed low carbon developments, the capital cost uplift is minimal and not a deterrent to delivery. Wider uptake would likely reduce this uplift" and "The 2 case studies that promoted a fabric first approach with simple services, the additional capital cost was only 1% to 2.5% of the construction cost" (<https://www.gov.uk/government/publications/building-for-2050/building-for-2050-low-cost-low-carbon-homes>). Market evidence suggests that energy performance is increasingly important among purchasers (<https://www.natwest.com/mortgages/greener-homes-attitude-tracker.html>), which is unsurprising given the rising costs of heating and suggests that any viability concerns presented against this policy are likely to be marginal at best. This evidence supports our view that the energy efficiency standards in SDN9.1 are justified and effective.

SDN9.2 concerns embodied carbon.

A Local Plan policy on embodied carbon is justified and effective because (i) it is not currently included in national planning policy but is needed to comply with national climate policy targets, and (ii) it does not cause issues with viability.

(i) Buildings account for 25% of the UK's annual GHG emissions, of which nearly half (10%) are from embodied emissions, making the reduction of embodied emissions essential to the UK's emissions reduction pathway (<https://ukgbc.org/wp-content/uploads/2023/02/operational-and-embodied-carbon-1.pdf>). National targets on reducing GHG emissions would be undermined if a category producing 10% of the nation's GHG emissions were not addressed in planning policy, at local or national level. So would the climate change objectives mentioned in NPPF 2024 section 14 and in the consultation draft (NPPF 2025, policy CC1). There is no national policy on embodied emissions yet, despite the government's intention flagged in its 2023 Future Homes and Buildings Standards consultation, at paragraph 1.1.4, "The government intends to consult on our approach to measuring and reducing embodied carbon in new buildings in due course." <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>. Until that is rectified, it is incumbent on local planning authorities to fill the gap in line with national climate policy. The NPPF instructs planning authorities to take a "proactive approach to mitigating climate change" in line with the objectives and provisions of the Climate Change Act 2008 (NPPF 2024 paragraph 162, draft NPPF 2025 CC1: Planning for climate change). SDNPA's proposed targets for embodied carbon are an example of such a proactive approach, especially as they are based on a growing body of

voluntary standards and are well supported by evidence (South Downs National Park Policy Study, A technical evidence base for embodied carbon planning policy, April 2026). It is also in the financial interests of developers and planning authorities to align with national long-term policy goals when they are known and expected but have not yet been implemented in the NPPF and Building Regulations.

(ii) An embodied carbon policy will not make development unviable. The evidence base quoted by SDNPA (South Downs National Park Policy Study, A technical evidence base for embodied carbon planning policy, April 2026) shows at page 8 that meeting the targets in the proposed policy “is not expected to add any cost to meeting operational net zero. This is because all scenarios tested including the baseline are below the recommended policy limits, or can be designed without additional cost”.

The standard of evidence needed to show the policy objective has been met seems quite reasonable and could even be tightened. For example, SDN9.2(c) refers to embodied carbon levels of $\leq 500\text{kg CO}_2\text{e/m}^2$ and $\leq 700\text{kg CO}_2\text{e/m}^2$. These are more generous than the $\leq 350\text{kg CO}_2\text{e/m}^2$ target that the government has set for its own buildings by 2030

(<https://www.gov.uk/government/publications/the-government-workplace-design-guide/sustainability-and-net-zero-annex#sustainability-targets-1>).

FURTHER COMMENT IN RELATION TO PM13

A potential challenge to the soundness of SDN9 could be based on the proposed PM13. The NPPF consultation draft (December 2025) included a policy PM13 that would limit the cases in which planning authorities can set their own standards, in effect setting a ceiling on energy efficiency instead of encouraging higher energy efficiency, contrary to the goals of national policy on energy efficiency.

The draft text of PM13 was strongly criticised at the consultation stage. Critics included the Chartered Institute of Housing, Low Energy Transformation Initiative (LETI), Royal Town Planning Institute, the British Property Federation, and numerous community groups including ours, among others. It seems possible that PM13 could be amended in some way that we do not yet know.

Given the criticisms and the possibility that its text could change, we hope the inspector will disregard the draft PM13 entirely.

Even if PM13 were to be considered, it is not clear that its current wording would require any modification to SDN9.2, the policy on embodied carbon.

As embodied carbon is an aspect of design, it would be permitted under PM13.1 provided that it complies with the three sub-paragraphs. Sub-paragraph (a) requires a standard to be justified and to utilise national standards. As explained above, the policy is justified by national policy on GHG emissions, and there is no national standard as yet. Sub-paragraph (b) says that a standard should not cover matters already addressed by Building Regulations. Embodied emissions are not currently covered by Building Regulations, so this sub-paragraph cannot apply. Finally, the draft sub-paragraph (c) says that a standard should not cover matters relating to the construction of buildings unless they are to implement the nationally described space standard. This sub-paragraph would also not apply if, as seems reasonable, embodied carbon is considered primarily a question of design rather than a construction process.

4 Policy SDH3: Accessible & Adaptable Homes

This policy can be found on Page 89 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box) ☐

No (if No insert X in the box) ☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared ☐

(2) Not justified ☐

(3) Not effective ☒

(4) Not consistent with national policy ☐

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box) ☒

No (if No insert X in the box) ☐

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We do not think that the targets and guidance in this policy would be effective in delivering the required number of accessible and adaptable homes. Hence this policy is unsound.

SDH3 Paragraph 2

We strongly support the baseline in SDH3 Paragraph 2 that all new dwellings should be adaptable in accordance with Part M4(2). However, we are not sure how the second part of this policy, which encourages wet rooms / accessibly bathrooms, would be applied in practice. Developments of more than 20 homes would be required to provide at least 10% of units to be capable of being adapted for wet rooms / accessible bathrooms. We recommend amending the supporting text to set an expectation at a similar level, recognizing that flexibility is sometimes needed for practical reasons.

SDH3 Paragraph 3

We are worried that the requirement for adaptable homes in Paragraph 3 will not be high enough, given the expected increase in older households and accessible housing needs described in HEDNA 2023.

The HEDNA forecasts a need of up to 75 new wheelchair accessible homes per year (Paragraph 7.32), after adjusting for the fact that many of the expected future wheelchair users already have (presumably adaptable or accessible) accommodation. 75 homes is about 24% of the 323 overall new homes per year foreseen in the draft Local Plan under SDH1.

This is much more than the suggestion in the HEDNA that 5% of new market homes and 10-15% of new affordable homes should be M4(3) compliant (para 7.34). We are not sure why there is this

discrepancy.

SDNPA has proposed in SDH3.3 that 10% of homes in developments of more than 20 dwellings should be adaptable under Part M4(3)(2A). While that is better than the HEDNA suggestion, it is too low to meet the 75 a year target, which requires 24%. We suggest that the requirement in Paragraph 3 be increased so that more homes would end up being M4(3) compliant. This could be achieved by a combination of (i) lowering from 20 to 10 the number of houses in a development at which the requirement applies (as in the Winchester Local Plan), (ii) increasing the M4(3) requirement for new market homes to a higher level, for example 10%, and (iii) adding a higher M4(3) requirement for new affordable homes (also in the Winchester Local Plan), which is currently missing.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

Regarding SDH3 Paragraph 2. We suggest adding to the end of Supporting text Paragraph 4.179 the following words

“... with an expectation, subject to practical constraints, that in developments of multiple houses, at least 10% of the new dwellings would have accessible wet rooms / bathrooms.”

Regarding SDH3 Paragraph 3. We suggest amending the wording as follows:

“Proposals for 10 or more new market dwellings shall provide at least 20% wheelchair adaptable homes Part M4(3)(2)a, unless it is demonstrated not to be practical to deliver onsite and an equivalent off-site contribution is provided. Proposals for 10 or more new affordable homes shall provide at least 30% wheelchair adaptable homes Part M4(3)(2)a.

5 Policy SDE1: Economic Development

This policy can be found on Page 104 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box) ☐

No (if No insert X in the box) ☒

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The introduction to Policy SDE1 (Paragraph 12) sets out an exclusive approach to employment, lifestyle and the environment which is detrimental to communities, especially the significant proportion of the population of the National Park who live or work in its Towns. This approach does not align with the evidence set out in the HEDNA and is inconsistent with national policy.

The sectors identified in Paragraph 12 as key do not represent the breadth of sectors that generate the higher levels of employment in the SDNP area. The South Downs area has a wide range of economic activity that pre-exists the formation of the National Park. 51,000 jobs supported by 6000-8000 registered businesses and countless sole traders. The largest employers in the National Park are Wholesale, Retail, Education, Hospitality, Healthcare, Public Administration and Defence Sectors (source: HEDNA 2023 10.20 p143). The breadth of the sectors within the National Park identified in the HEDNA does not align with those identified in Paragraph 12.

A narrow approach to employment, lifestyle and the environment, which is too focused on the rural economy, would be detrimental to large sectors of the community that have lived within the South Downs area from a time long before the National Park was created. The current issues around the affordability of housing, the availability of work and the type of work does not establish an inclusive and living landscape that is available to all. Rather the impact is increased commuting in and out of the area to avoid, or satisfy housing affordability, and the transfer of the local economy out of the National Park.

Paragraph 12 is inconsistent with Paragraph 88 a) of the NPPF. This specifies that *“Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings, etc”*.

The policy statements within Policy SDE1 appear to be broadly in line with the NPPF and so we do not propose that these are amended. The main problem lies within the text in Paragraph 12.

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It is proposed that Paragraph 12 is amended by inserting the following new paragraph which should precedes the existing text:

We support economic development and diversification that is sustainable and in accordance with the Local Plan vision. We recognize the role of planning decisions in helping create the conditions in which local businesses invest, expand, adapt and contribute to the local economy. This is the most economically active National Park in the UK with over 5,950 businesses employing 61,000 people (Source: South Down National Park Economic Profile 2025).

6 Policy SDT1: Vision-led Transport Approach

This policy can be found on Page 128 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

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Vision-led Transport Approach

Paragraph 1 of Policy SDT1 requires that development proposals should take a vision-led approach to transport solutions. This is a version of the transport planning principle of “decide and provide”, rather than the “predict and provide” approach of previous plans. Policy SDT1 and the supporting text in Paragraph 4.275 is not consistent with the Authority’s transport evidence because it does not reference the transport vision set out in the Authority’s transport evidence. This can be found in Paragraph 1.3.1 of South Downs Transport Study Transport Assessment by Royal Haskoning, dated November 2024.

Policy SDT1 and the supporting text about the vision is generic and not specific to the South Downs, or the different areas within the National Park. In addition, it does not describe what house builders should provide within their vision, rather it leaves house builders uncertain about how to approach the key issues of design when developing their schemes and uncertain about the outcomes which are likely to be acceptable to the Authority. This generic approach is not effective, in addition to being inconsistent with the Authority’s transport evidence.

Differing needs and priorities

Connectivity zones in green, purple, amber and white are identified in Figure 3.3 of the Local Plan but this is not translated into the transport vision or policies. The implication is that the same approach applies throughout the Park and this appears to be largely based on the generic principles of sustainable transport (while a key part of SDT3 is based on the general principles of rural highway design as set out in the *Roads*

in the South Downs document). The plan does not recognise the special transport issues within the Park and the differences in transport needs between the towns, villages and rural areas. The policy promotes access to public transport to enable access to work, recreation etc, but does not respond to the different areas of the Park, their differing needs and priorities, nor does it direct potential investment from new developments to help towns such as Petersfield become more sustainable in transport terms.

The South Downs Transport Study

The South Downs Transport Study uses TRICS trip data that appears to be for between January 2016 and June 2023 for various sites/types of use from around England, not specifically within the SDNP, or any other National Park. It is unclear whether these data sets are relevant as the black box consultant approach is difficult to penetrate. TRICS data appears to be of an age and type that does not take full account of the post-Covid world in which home working is more common, or hybrid working (which is common among those with a degree or equivalent), or the specifics of the SDNP. Analysis by ONS provides evidence of these trends in home working. The lack of information of the particular demographic working patterns in the Park is a concern. In addition parts of the South Downs Transport Study use a version of the LCWIP for East Hampshire which has been withdrawn and replaced by a new edition prepared by Hampshire County Council. Hence parts of the Transport Statement are not up-to-date, as required by the NPPF (Paragraph 32). The SDNPA evidence therefore has some failings.

Paragraph 3 of SDT1

In Paragraph 3 of SDT1, the first sentence implies that cycling may not be relevant to developments that generate a significant number of journeys. This is inconsistent with national policies which require that “sustainable transport modes are prioritizing” and “giving first priority to pedestrian and cycle movements” (NPPF (Dec 2024) Paragraphs 115 and 117.

References used in the text above:

1. The ONS analysis of home/hybrid work released June 2025 can be found at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/whohasaccesstohybridworkingreatbritain/2025-06-11>

2. Hampshire County Council LCWIP for East Hampshire can be found here:

<https://documents.hants.gov.uk/transport/East-Hampshire-District-LCWIP-2025-Final-Report.pdf>

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments that we set out under Question 4.

The extent of the evidence that is appropriate to ensure that the Plan is sound is a question for the Planning Inspectorate. However it is clear to us that the transport policies should be re-formulated in a manner that addresses the following:

1. Gives clear, consistent and practical guidance to house builders about what they should provide to comply with the vision-led transport approach stipulated in Paragraph 1.

There is a risk that house builders provide generic statements describing their transport vision but which are meaningless in practical terms as they do not result in good connectivity and sustainability. Here are some suggestions to make house builder's transport planning less generic. The sub-paragraphs under Paragraph 109 of the NPPF (Dec 2024) should be taken into account within the policy requirements. National Model Design Code by MHCLG is also useful. Guidance should be provided about whether the vision-led approach can be integrated into a masterplan, where this is required, or set out in the Design and Access Statement. The evidence required for the vision-led transport solution should be proportionate to the scale of the site and proposed development. House builders/developers should be strongly encouraged to propose transport solutions and pursue opportunities for connectivity during the earliest stages of scheme preparation.

2. Recognizes the different transport considerations between rural and urban areas within the National Park. The Park has the largest towns of any UK national park, which provide services (schools, hospitals, surgeries, supermarkets, sports grounds, etc) to the surrounding areas and contain businesses employing many people some of whom live locally, while others commute from outside the Park. As a minimum, the differences in transport challenges, transport solutions, opportunities for increasing the sustainability of transport between green and white zones should be recognized and provided for in SDT1 (and SDT3).
3. Sets out more clearly the transport challenges that are specific to the Park.

In Paragraph 3 of SDT1, the phrase "where relevant " should be deleted from the first sentence.

7 Policy SDT2: Active Travel Routes

This policy can be found on Page 130 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

☐

No (if No insert X in the box)

☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

☐

(3) Not effective

☒

(4) Not consistent with national policy

☐

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

☐

4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

This is part of a joint submission by [Petersfield Climate Action Network](#) (PeCAN) and the [Petersfield Society](#).

We strongly support this policy which is consistent with national policy. Paragraph 111 c) of the NPPF (Dec 2024) recognizes the need to identify and protect sites and routes, where there is robust evidence, which could be critical in developing infrastructure to widen transport choices.

However Paragraph 3 policy SDT2 will not sufficiently meet the SDNPA's aims of protecting potential active travel routes along former railway lines because it is not clear that the Authority wishes to safeguard the connections which are critical to providing access to the potential active travel routes along former railway lines, as well as protecting the ground upon which the railway lines were laid when the lines were in operation (the track bed). Achieving adequate links from the road network, residential neighborhoods and town centres to railway paths is often a challenge. This is confirmed on Page 25 of the book Potholes and Pavements by Laura Laker published by Bloomsbury in 2024 and by our knowledge of the situation in Petersfield. Multiple connecting links to railway paths are likely to be appropriate in urban areas and in larger villages. Realising connections for users of wheelchairs, hand cycles and mobility scooters is an even larger challenge. In our experience, housebuilders/developers and planning officers are not fully aware of the local aspirations for active travel routes, or aware where connecting links to active travel routes are critical to the success of such routes.

In some cases the potential active travel routes along former railway lines will be forced to deviate from the alignment of the former track bed because of recent building, gardening activity, farming operations, or because of the presence of protected wild life (badgers) and protected trees. Hence the safeguarded corridor should be wider than the corridor needed for a path, especially in urban areas and near the trailheads. In this context, safeguarding should not prohibit development, but should reduce the potential for conflicting development through a process that openly identifies this land so that potential conflicts can be assessed by the planning authority in a timely manner that allows for the developments to be built, while protecting the land that is critical for building the active travel routes. Such safeguarding does not guarantee that the infrastructure will be built in future.

As drafted, SDT2 does not specify the width of the corridors that are safeguarded by SDT2 and it does not provide effective protection, other than for the narrow corridor of ground used by the former trackbed. This is not adequate for the reason set out above. In the interests of effectiveness, Policy SDT2 should be modified.

In Paragraph 4.283 of the supporting text for SDT2, the first sentence provides a definition of the active travel network which is not consistent with promoting sustainable transport solutions, as required by national policy as set out in Section 9 of the NPPF (Dec 2024). The definition of “Active travel network” does not include routes which are used for utility journeys such as for shopping, visiting GPs, visiting hospitality venues, visiting friends, etc . Such trips may be among the main reason for travel especially in urban areas where one third of the National Park’s residents live. In addition, the definition refers to both “leisure” and “recreation” purposes, but these words have the same meaning in this context, so this sentence is repetitious. The definition should be modified to address both of these flaws.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

It is proposed that Paragraph 3 of Policy SDT2 is modified so that it is clear to house builders/developers that the safeguarded land extends beyond the old trackbeds. The width of the safeguarded corridor/site should be indicated within the policy, or in supporting text, and on the Planning Policy Map. A wider safeguarded corridor may be appropriate in urban rather than rural areas because multiple connections between railway paths and the local road network, residential neighborhoods and town centres are likely to be needed. Connecting links to active travel routes which are critical to the success of such routes should be identified. The supporting text should identify stakeholders and encourage early engagement with stakeholders and local communities.

We recommend that the first sentence of Paragraph 4.283 is modified. The term “leisure” should be changed to “utility trips”, such that the definition reads as follows. The network of active travel routes used by active travel users for commuting, utility trips and recreational purposes.

8 Policy SDT3: Highway & Public Realm Design

This policy can be found on Page 132 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

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No (if No insert X in the box)

☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

☐

(3) Not effective

☒

(4) Not consistent with national policy

☒

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

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No (if No insert X in the box)

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4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

This is part of a joint submission by [Petersfield Climate Action Network](#) (PeCAN) and the [Petersfield Society](#).

Three problems have been identified with Strategic Policy SDT3 and the supporting text. These are described in the paragraphs below.

Problem 1

Paragraph 1 of Strategic Policy SDT3 refers to the SDNPA document *Roads in the South Downs*. An approach to transport solutions that is specific to the South Downs is appropriate, but a more nuanced approach is needed in relation to the towns in the Park. The focus of *Roads in the South Downs* is rural roads and villages, as mentioned on the second and fourth pages. There have been numerous government transport policy initiatives (about inclusivity, active travel, safety etc) and guidance documents published by DFT since it was published in 2015, as well as updates of the NPPF. The guidance and case studies within *Roads in the South Downs* are not universally applicable to the towns within the National Park with their busy high streets, transport hubs, extensive residential neighborhoods, and industrial/employment areas. The Core Principles on Page 14 are useful but limited in their scope. Its inclusion in the list of guidance documents is appropriate but the text of Paragraph 1 should be modified to make this paragraph more consistent with National Policy (Paragraph 32 and Sections 7, 8 and 9 of the NPPF (Dec 2024)).

Problem 2

Paragraph 3 of Strategic Policy SDT3 requires that development proposals should support “*healthy active environments*”. This aligns with national policy (Paragraph 96 of the NPPF (Dec 2024)). However SDT3 does not clearly identify how house builders should fulfill this requirement. This phrase is not in everyday use and few people will be familiar with the associated design principles.

Neither the supporting text nor the list of guidance documents are helpful about this topic (the key guidance document appears to be Active Design by Sport England, ATE and DFT). In view of this, Paragraph 3 is unlikely to meet the SDNPA's aims, rather it leaves house builders uncertain about how to address this policy when developing their schemes. Changes to Paragraph 3 and the supporting text are needed to ensure that this policy is effective.

Problem 3

NPPF (Dec 2024) Paragraph 115 b) specifies that "*safe and consistent access to the site can be achieved for all users*". However Paragraph 2 of SDT3 only requires that "Particular attention will be given to new access points...." Without mentioning safety or stipulating that this applies "for all users". Hence the Draft Local Plan is not consistent with national policy as currently drafted. A modification is needed to address this topic. Factors relating to access are featured in NPPF Paragraphs 115 b) and 117.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

Modifications Proposed to Address Problem 1

It is proposed that Paragraph 1 of Policy SDT3 should be modified by replacing "principles" with Core Principles".

In addition, Paragraph 1 should be modified to indicate that these principles apply in rural roads and villages and that the design principles in MHCLG's National Design Guide and set out in Healthy Streets are applicable in towns.

Modifications Proposed to Address Problem 2

It is proposed that Paragraph 3 is clarified by introducing a new paragraph in the supporting text for Policy SDT3. The following text is proposed (this text was copied from Page 2 of Active Design by Sport England, ATE and DFT and then condensed).

Active environments are the spaces and places for people to be active, which encourage all physical activity, such as active travel, children's play, outdoor leisure and other opportunities for people to be active, as well as sport and exercise. By providing opportunities for physical activity, active environments can help improve the physical and mental health of adults and children. Where we live, work, travel and play has a major role in shaping our activity choices. By applying Active Design principles to our built and natural environments, we can create active environments that encourage people to be active through their everyday lives.

In addition, the following document should be added under the heading "Guidance": Sport England, Active Travel England and DFT, Active Design, Creating Active Environments Through Planning and Design, May 2023.

Modifications Proposed to Address Problem 3

It is proposed that a new paragraph be added to SDT3 that reflects and amplifies NPPF (Dec 2024) Paragraph 115 b) and covers NPPF Paragraphs 115 b) and 117 a) and d).

9 Site Allocation SDA8: Land Near Causeway House

This can be found on Page 159 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

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No (if No insert X in the box)

☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

☐

(3) Not effective

☒

(4) Not consistent with national policy

☒

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

☐

4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

This is part of a joint submission by [Petersfield Climate Action Network](#) (PeCAN) and the [Petersfield Society](#).

We consider Policy SDA8 to be unsound for the reasons set out in the paragraphs below.

Policy SDA8 Requirement 1

Policy SDA8 Requirement 1 calls for a “site-wide masterplan”, but this phrase discourages house builders from identifying the connections beyond the site boundary to the wider road/path/cycle networks and assessing movement for all modes of transport, as recommended in the National Design Guide. The Local Plan lacks a description of what should be provided for this masterplan and how this is distinct from the normal housing layout scheme. This leaves house builders uncertain about how to approach the preparation of this masterplan and the outcomes which are likely to be acceptable. The spatial extent, scope, content, level of detail, and the volume of evidence are all unclear and so this policy is ineffective.

The extent of the community engagement about the proposed masterplan is unclear. We note that this site and SDA9 were not included in the Regulation 18 consultation and that community consultation is required by national policy (NPPF (Dec 2024) Paragraphs 132 and 134). Also that the South Downs Transport Study -Transport Assessment (November 2024) does not provide an assessment of this site.

Policy SDA8 Requirement 1 calls for works to the Listed Building to be “included in the first application or phase of development”. However there is no reference to any problems with Causeway House and no justification for the “works” required. A justification for the proposed works is needed for the purposes of clarity.

Policy SDA8 Requirement 3 - Access to the Site

Two flaws in Policy SDA8 suggest that it has not been prepared with the active involvement of the local highway authority, contrary to national policy as set out in NPPF (Dec 2024) Paragraph 111 b). A traffic calming scheme planned by the local highway authority along The Causeway on the western boundary of the site does not take account of the new access need for this site. Details of this can be viewed on the SDNPA planning portal under planning reference number SDNP/23/03638/FUL, see drawing number 8210952/6121 posted on 17th May 2024 and the legal agreement posted on 6th September 2024. In addition, Requirement 3 is inaccurate where it identifies a shared pedestrian and cycle route on the western side of The Causeway at the proposed highway access point. An inspection of The Causeway by our volunteers during June 2026 showed that there is a pavement on the west side but not a shared pedestrian and cycle route. Surface markings indicated that pedal cycles should use the main carriageway of the road. A pdf file containing photographs of the surface markings will be uploaded to illustrate this.

Policy SDA8 Requirement 3 is unsound because it fails to prioritise pedestrians and cycle movements, as required by NPPF (Dec 2024) Paragraph 117 a). As currently written this paragraph recommends that the provision of a pavement on the eastern side of the Causeway “*should be limited as far as possible.*” It fails to recognize that at peak times, the two lanes of traffic flowing along The Causeway (B20270) can be a significant barrier for pedestrians and cyclists. Without good crossing facilities, there is a risk of creating a socially isolated enclave, contrary to NPPF Paragraph 96 a). It cannot be assumed that a suitable solution for site access for all modes can be achieved and that landscape considerations can be prioritized over active travel accessibility and safety.

The suggestion in Requirement 3 that a pavement would negatively affect the character of The Causeway is specious. This part of The Causeway is already urban in character with housing opposite which extends to the south and houses south of the Site on the eastern side. The development of this site will further urbanise the area, not least because it will require a new road access. This will alter the character of the immediate area and contribute to urbanisation. In addition, the Plan itself proposes to further urbanise the area southward by allocating new housing at site SDA9.

The western boundary of Causeway House is currently formed by a low hedge and fence. If it is necessary to remove the hedge and fence this can be easily replaced by a sensitively designed new boundary, either fencing, hedgerow, or new wall to create an attractive boundary alongside a new pavement. Provision of a new pavement in this location would offer a safe pedestrian thoroughfare northward from the Site towards the local schools, stores, health facilities etc.

Policy SDA8 Requirement 4

Requirement 4 is too limited in scope in relation to walking and cycling routes. This policy fails to identify all of the potential opportunities for connections to the wider walking and cycling networks and also fails to require a comprehensive access and movement strategy including actively pursuing opportunities for connections to the wider walking and cycling networks in the early stages of planning. Requirement 10 f) should prioritise both pedestrian and cycle movement, as per NPPF Paragraph 117 a). Currently, SDA8 is not consistent with Paragraphs 109, 115 and 117 of the NPPF (Dec 2024).

We recommend that the supporting text be changed to recognise the importance of providing additional walking and cycling routes towards the Town because the route along The Causeway (B2070) is poor. Pedestrians walk alongside traffic which is busy for much of the time and the pavements lack a buffer strip to separate the carriageway. The pavements are narrow in parts and the crossing opportunities are limited. Cyclists are expected to share the carriageway with vehicles but safety concerns will exclude most potential cycle users, according to criteria set out in Figure 4.1 of LTN 1/20 by DfT. Hampshire County Council’s LCWIP for East Hampshire recommends numerous

improvements to The Causeway.

Policy SDA8 Requirement 6 and 7

SuDS (Sustainable Drainage Systems) are mentioned in keeping with the National Standards (NPPF 2024, Paras 164, 181 & 182), which require (SuDS) to be prioritised in the planning of all housing developments. The necessity for this being to mitigate run off from buildings within the development in addition to surface water runoff. However, the wording used in these paragraphs is not strong enough as it fails to emphasise the absolute necessity for long-term maintenance, a key factor without which SuDS is rendered ineffective. Indeed, the CIRIA SuDS manual (Woods Ballard et al., CIRIA C753, 2015) makes it clear that regular inspections and maintenance are necessary to maintain effectiveness. In order to ensure this happens a written agreement needs to be made stating exactly which body will be responsible for maintenance and its frequency. This is imperative as the geology of the site makes it likely that the use of soakaways would be ineffective.

There is no mention of a site-specific flood risk assessment in the requirements. Given the geology of the site there should be a site-specific flood risk assessment focusing on surface water flooding and run off beyond the site boundaries.

Archaeology

There is no mention of archaeology in the requirements. Since several significant finds have been recorded on the southeastern side of the Causeway in the vicinity of the site (eg finds on development adjacent to Goodyer Meadows and the Buriton Hoard) it is important that it undergoes an evaluation of potential archaeological features prior to a planning application being submitted.

Full Reference to the SuDS Manual

Ballard, B., Wilson, S., Udale-Clarke, H., Illman, S., Scott, T., Ashley, R. & Kellagen, R. (2015), The SuDS Manual, CIRIA C753, CIRIA, London.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

Modifications Proposed to the Policy Requirements

Policy SDA8 Requirement 1 should be modified to describe the required extent, scope, content, level of detail, and the volume of evidence etc to be provided within the masterplan, which should refer to transport connections beyond the site boundary. The extent of community consultation about the proposed masterplan should be described and this should take account the lack of consultation before this Reg 19 consultation. The relevant guidance documents about masterplans should be identified.

Requirement 3 should be modified after the National Park has discussed the potential access arrangements with the local highways authority. The suggestion that a pavement may negatively affect the character of The Causeway should be removed.

Requirements 4 and 10 f) should be modified to specify walking and cycling connections from the site to Reeves Drive and Leachman Way to the north, in addition to a PROW through the Site. The text should stipulate a comprehensive access and movement strategy assisted by actively pursuing opportunities for connections to the wider walking and cycling networks during the early stages of

planning.

Requirement 7 should be modified by adding the following text after the current text:

Provides any required flood mitigation measures and maximise opportunities for multi-functional Sustainable Drainage Systems with an emphasis on nature-based, above ground and connected elements rather than underground engineered solutions and include a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance for the lifetime of the development;

An additional paragraph needs to be added to the requirements that addresses the flood risk assessment (NPPF, 2024, para 181). It should read:

Provide a site-specific Flood Risk Assessment with a focus on surface water flooding that demonstrates how the development will be safe for its lifetime taking climate change and the vulnerability of the developments users into account and ensure that flood risk is not increased elsewhere as a result of the development.

An additional paragraph should be added to addresses potential archaeology that may be associated with the site. It should read:

Evaluation of potential archaeological features on the site will be carried out prior to any planning application being submitted so that the design and layout can take into account the preference to retain and protect any such features discovered.

Requirement 10 f) should be modified so that both pedestrian and cycle movements are prioritised.

Modifications Proposed to the Support Text

Paragraph 5.29 in the supporting text should be modified by adding a justification for the proposed works.

In the supporting text reference should be made to SDW3 in addition to the existing reference to SDW2. SDL9 should also be added.

Additional Evidence Uploaded to Support Comments about SDA8

Photographs of the Surface Markings on The Causeway

This note provides two photographs of the Surface Markings on The Causway near SDA8 - Land at and to the rear of Causeway House. These are provided to support the joint submission by [Petersfield Climate Action Network](#) (PeCAN) and the [Petersfield Society](#).



Figure 1: view of the Causeway near SDA8 looking north. The surface makings on the carriageway indicate that pedal cycles should use the carriageway.



Figure 2: view of the Causeway near SDA8 looking south. Both photographs were taken on 14 June 2026.

10 Site Allocation SDA9: Land south of The Causeway

This policy can be found on Page 162 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box) ☐

No (if No insert X in the box) ☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared ☐

(2) Not justified ☐

(3) Not effective ☒

(4) Not consistent with national policy ☒

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box) ☒

No (if No insert X in the box) ☐

4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

This is part of a joint submission by [Petersfield Climate Action Network](#) (PeCAN) and the [Petersfield Society](#).

We consider Policy SDA9 to be unsound for the reasons set out in the paragraphs below.

Lack of Effective Community Engagement

National policy (NPPF (Dec 2024) Paragraph 16) requires effective community engagement about local plans but there has not been effective engagement about two sites which are new to this version of the Local Plan (SDA8 and SDA9), as they were not included in the Regulation 18 consultation. During the Regulation 19 process, public meetings have been limited in scope and number. A PeCAN volunteer who attended the public meeting about this consultation in Petersfield on the 21st May reported that the focus of this event was on the process of submitting comments rather than about the policies in the Local Plan.

The Remoteness of the Site from the Town Centre

This site is relatively remote from Petersfield Town Centre, schools and from shops and so that nearly all house holders will travel by car, especially as the walking and cycling connections are of poor quality. The SDA9 site is 1.9 km from the centre the Square in the centre of Petersfield, 1.5 km to the nearest shop (Tesco) and 1.3 km to the nearest school. This is substantially in excess of the walking distance recommended by government guidance about the distance to local amenities which states that “A mix of local amenities should be located within an 800m walking and wheeling distance (using well-designed routes) of all residential properties...” (source: Page 7 of Active Travel England Standing Advice Note: [Active travel and sustainable development](#), 2024).

The pavements along the Causeway are narrow in parts and the crossing opportunities are limited. Pedestrians on the Causeway walk alongside traffic only separated by a kerb. At times when traffic flows are high or where traffic speeds are higher, the lack of a safety buffer to provide physical

separation is uncomfortable and discourages walking.

Local amenities are within cycling distance but cyclists are expected to share the carriageway with vehicles, with safety concerns excluding most potential cycle users, according to criteria set out in Figure 4.1 of LTN 1/20 by DfT, based on measured traffic flows and speeds and taking account of the lack of segregated cycling lanes. Hampshire County Council's [LCWIP for East Hampshire](#) has recommended numerous improvements to The Causeway but these are not funded. Small developments such as SDA9 do not produce sufficient developer's contributions to upgrade active travel networks in an effective manner. The bus services along the Causeway are limited (as is typical of small Hampshire towns).

Sites SDA9 and SDA11 are not considered in the National's Parks Transport assessment. The relative remoteness of this site raises questions about whether the National Park's spatial strategy (Paragraphs 3.24-3.37) and Transport Assessment are sufficiently detailed to deliver sites which are sustainable in transport terms.

Policy SDA9 fails to recognise the challenges facing people who wish to walk and cycle to Petersfield from the Site and the improvements needed to make these modes sensible options for everyday travel. It fails to require a comprehensive access and movement strategy including actively pursuing opportunities for connections to the wider walking and cycling networks in the early stages of planning as specified by national planning policy.

Good walking and cycling connectivity is essential to achieve a genuine choice of transport modes. Without it, sustainable development will not be achieved, contrary to Paragraph 110 of the NPPF (Dec 2024). Most critical for sustainability are good quality walking & cycling connections to the Town Centre and amenities such as The Petersfield School, Petersfield Infant School and the Grange Surgery which are situated at the north end of the Causeway.

The combination of the remoteness of the site, inadequate active travel routes and limited scope for developer contributions makes this site unsustainable in transport terms. This is contrary to the declared intention of national planning policy (Section 9 of the NPPF (Dec 2024)).

Causeway-wide Masterplan

Instead of requiring a house builder to develop separate master plans for SD8, SDA9, and SDA 11, a masterplan should be prepared by the National Park for the whole of the Causeway and the surrounding neighbourhood in conjunction with the District and Town councils, the local highway authority, and the local community. This would be a more effective way to set a clear vision for the sites and to address the common issues that impact the whole area. A Causeway-wide master plan would provide more effective community engagement about the new sites on the Causeway (SDA8 and SDA9) and enable better assessment and mitigation of cumulative impacts in a variety of areas, as explained below.

During the last 25 years, successive layers of small scale developer-led housing schemes have been constructed on the Causeway and it is apparent that this has resulted in developments that are disjointed in character and have poor walking and cycling connections. Unless these connections are planned in detail at an early stage, the commercial focus of house builders often blocks the delivery of such connections, as has occurred locally. The recent developments constructed along the Causeway fall short of the high quality, beautiful and sustainable buildings and places that should be achieved according to national policy (NPPF (Dec 2024) Paragraph 131). Hence a different and more effective approach is needed in order to comply with national policy.

The cumulative impact of the developments along the west of the Causeway have increased the burden on the watershed such that there were already community concerns about downstream flooding prior to site allocations SDA8, SDA9 and SDA11 being made, especially with planning already granted for three developments that are due to be constructed in the near future:

- SDNP/23/03638/FUL, 54 dwellings
- SDNP/23/04270/OUT, Hotel & cycle centre
- SDNP/21/06431/FUL, 60 eco lodges and recharge centre.

To comply with national policy (NPPF Paragraph 171), a strategic flood risk assessment is required that manages the flood risk from all sources and takes account of cumulative impact. Patterns of transport growth should be actively managed (NPPF Paragraph 110).

Both traffic and flooding are among the issues that should be assessed and planned in a holistic manner, rather than continuing the piecemeal approach, with the cumulative impacts of the both the several imminent developments being assessed along with the new site allocations. The impact on the wider community beyond the individual sites should be taken into account. Without this, the new sites on the Causeway will contribute to traffic congestion along the Causeway and will not deliver adequate walking and cycling connectivity, while the flooding issue will not get adequate attention and the concern within the community will grow.

Drainage and Flooding

In Requirement 7, SuDS (Sustainable Drainage systems) are mentioned in keeping with the National Standards for (NPPF 2024, Paras 164, 181 & 182), which require SuDS to be prioritised in the planning of all housing developments). The necessity for this being to mitigate run off from buildings within the development in addition to surface water runoff. However, the wording used in these paragraphs is not strong enough as it fails to emphasise the absolute necessity for long-term maintenance, a key factor without which SuDS is rendered ineffective. Indeed, the CIRIA SuDS manual (Woods Ballard et al., CIRIA C753, 2015) makes it clear that regular inspections and maintenance are necessary to maintain effectiveness. In order to ensure this happens a written agreement needs to be made stating exactly which body will be responsible for maintenance and its frequency. This is imperative as the geology of the site makes it likely that the use of soakaways would be ineffective.

There is no mention of a site-specific flood risk assessment in the requirements. Given the geology of the site there should be a site-specific flood risk assessment focusing on surface water flooding and run off beyond the site boundaries.

Full Reference to the SuDs Manual:

Ballard, B., Wilson, S., Udale-Clarke, H., Illman, S., Scott, T., Ashley, R. & Kellagen, R. (2015), The SuDs Manual, CIRIA C753, CIRIA, London.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following which address the arguments set out under Question 4.

The inclusion of this site within the Local Plan should be paused until the completion of a masterplan for the Causeway area which encompasses SDA8, SDA9 and SDA11. This should be prepared by the National Park in conjunction with the District and Town councils, the local highway authority, neighbourhood planning groups and the local community. The community engagement should be effective, especially in light of the lack of Reg 18 consultation on some of the affected sites.

The scope of this masterplan should include an assessment of the cumulative impacts on traffic and the potential for downstream flooding, and it should examine the viability of travel options beyond

the private car by planning active travel routes in an informed, far sighted and ambitious manner. Bus services should also be considered. It should set a clear vision for the sites and clearly identify the most effective use of developer contributions and other funding avenues.

In the meantime, we think that a more appropriate site should be found to replace SDA9.

In the event that SDA9 is redrafted in the future, we recommend that an additional paragraph is added to the requirements to address the flood risk assessment (NPPF, 2024, para 181). It should read:

Provide a site-specific Flood Risk Assessment with a focus on both surface water and overbank flooding that demonstrates how the development will be safe for its lifetime taking climate change and the vulnerability of the development's users into account, and ensures that flood risk is not increased elsewhere as a result of the development, particularly downstream to the north of the site.

Para 7 of the requirements should re-drafted to read-

Follows a sequential approach, directing built development away from flood zones 2 and 3, and provides any required flood mitigation and drainage measures and opportunities for Sustainable Drainage Systems with an emphasis on nature-based, above ground and connected elements rather than underground engineered solutions and includes a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance for the lifetime of the development;

In the supporting text reference should be made to SDW3 in addition to the existing reference to SDW2.

11 Site Allocation SDA10: Land at Penns Place

This policy can be found on Page 164 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

☐

No (if No insert X in the box)

☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

☐

(3) Not effective

☒

(4) Not consistent with national policy

☒

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

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4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

We consider Policy SDA10 to be unsound for the five reasons set out in the five paragraphs below.

SDA10 is not clearly written which is detrimental to public engagement, especially in view of the busy community facilities within the developable boundary. The problem is the combination of inadequate maps and a lack of explanation of the site context. The maps for Policy SDA10 do not indicate the existing buildings, or car parks, creating uncertainty whether the Taro Leisure Centre, the Petersfield Rugby Club, the (unadopted) access road which connects to Harrier Way, and the associated car parks are within, or outside, the developable areas. Only after enhancing and enlarging the map using photo editing software did we ascertain the boundaries relative the existing buildings.

Requirement 1 of Policy SDA10 identifies the need for a masterplan but the Local Plan lacks a description of what should be provided for this masterplan and how it is distinct from the normal site specific proposals. This leaves house builders uncertain about how to approach the preparation of this and the outcomes which are likely to be acceptable. The spatial scope, content level of detail and the extent of the required evidence are all unclear and so this policy is ineffective.

We assume that the intention of the phrase “site-wide masterplan” is that this should be circumscribed by the Reg 19 site boundary rather than only the Parcel boundaries. Although this boundary is wider than developable area, it is not sufficiently wide to be consistent with the part of

the National Design Guide which says that recommends “a connected network for all modes of transport”, which involves identifying the connections to the wider road/path/cycle networks and the assessment of movement and accessibility.

The accessibility of the site, car parking and unsustainable transport are a challenge because the site is on the extreme eastern edge of the Petersfield, with access along narrow residential roads and is poorly served by public transport (a limited weekday bus service). Parking congestion is an issue on a daily basis and is acute during sports tournaments, such that anything larger than a mini-bus will have difficulty reaching the Site (coaches mentioned in Requirement 6). The masterplan should include solutions for movement that take account of the wider neighbourhood and thoroughly explore every opportunity to facilitate active travel walking in order to be effective and in the interests of sustainability development. There are opportunities to facilitate active travel which are not currently identified in Policy SDA10, or adequately prioritized, as required by National Policy (NPPF (Dec 2024) Paragraphs 115 a) and 117 a). We have set out a list of opportunities in our response to Question 5.

The resources available to a house builder who wishes to promote a scheme of 35 dwellings are unlikely to be sufficient to prepare a masterplan that adequately quantifies and mitigates the growing volume and diversity of movements through and to this site, while taking account of the extensive community facilities together with the growth of movements caused by the imminent development of adjacent sites where conditional planning is has been granted (SDA70 (17 units), SDNP/25/04090/FUL (70 units), SDNP/22/04472/FUL (97 units)) and from the potential Rother Valley Way (a railway path opportunity identified in Policy SDT2). Indeed this may be a disproportionate imposition. An entirely developer-led approach is unlikely to deliver a high quality sustainable site, as required by National Policy. The National Park should prepare a master plan for this site and the surrounding neighbourhood in conjunction with the landowners (the District and Town Councils), the local highway authority, and other stakeholders in order to set a clear vision for the site and to clearly identify requirements for developer contributions or for other investment.

Parcel B is a potential site for additional community facilities, as well as for housing, but the current wording of Requirement 5 could be interpreted as only permitting residential development. This should be clarified. We recommend that the wording is loosened to include other development that fits the masterplan.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

A paragraph should be added Policy SDA10 to explain the context of this site and the size and resolution and contrast of the maps should be increased.

Instead of requiring a house builder to develop a master plan, the National Park should prepare a masterplan for this site and the surrounding neighbourhood in conjunction with the District and Town councils, the local highway authority, and other stakeholders in order to set a clear vision for the site and to clearly identify requirements for developer contributions or other investment.

The site's significant transport challenges should be recognized and described in the supporting text for SDA10, including parking congestion. Many useful improvements to assist active travel to the site via Durford road are described in HCC's LCWIP for East Hampshire and so this document should be referenced. Future travel choices should be widened for users of the Taro Leisure Centre and of the other leisure and sports facilities by more fully describing the opportunities for improved and new active travel routes in the text of Policy SDA10. The following is a list of active travel potential active travel routes, some of which are not identified in SDA10 (each route is described in terms of its rough compass direction relative to the Taro Leisure Centre):

1. Towards the west and the Town Centre via Durford Road using a) the existing route across the Playing field to Heathfield or Barnfield Road, across Pulens Lane and parallel to Tilmore Brook (extensive improvements are required to bring it up to national standards in addition to those planned as parts of HCC's Pulens Lane scheme. Or b) using Route 220 in the LCWIP for East Hampshire (numerous improvements are recommended by HCC).
2. Towards the north-west to Sheet via SDA70 as recommended by the National Park's Development Brief (2018) and facilitated by the on-going planning application and an initiative by the and Rotherlands Connections Project by the Western Sussex River Trust. With additional links to Pulens Lane via Rotherlands (using part of PROW 189/502/1) or alternatively through the Alderbrook development using the permissive path into Barnfield Road.
3. Towards the east facilitated by the path planned by Churcher's College on their land which connects the north east edge of the playing fields to PROW 189/30/1 (the Serpents Trail). This initiative is part funded by a CIL grant administered by the National Park.
4. Towards the south-east to connect to the potential Rother Valley Way railway path and the Serpents Trail (PROW 189/30/1) to improve access for Petersfield residents into the National Park. It is important to note that the re-use of the old railway embankment for a path is likely to be impractical because of badger setts, protected trees and difficulties from gradients on access links (see the submissions from the Friends of the Rother Valley Way for SDNP/25/04090/FUL). Hence alternative solutions for accessing the disused railway line should be taken into account.

SDG3 (Public Open Space, Sports and Recreational Facilities) should be added to the list of relevant Local Plan Policies.

The unadopted Penns Road is within the developable area. The policy or supporting text should identify the opportunity that this site presents to: a) improve pedestrian and cycle crossings at the junction of Penns Road, Harrier Way and the adopted part of Durford Road and the unadopted part of Durford Road. In their submissions to the Authority for a recent planning application (SDNP/25/04090/FUL (70 units)), the local highway authority raised safety concerns about the proposed crossing arrangements which were not addressed and planning permission was granted. This site allocation provides an opportunity to address this, which should be identified in the policy text.

The policy should include provision for secure, covered and prominently located cycle parking facility in order to widen the choice of travel modes thus increasing the sustainability of the site. The distance to the town center and many parts of the town that cycling is too great for walking to be practical for most people (according to the criteria set out in SDG3).

Requirement 5 should be modified to include other development that fits the masterplan.

12 Site Allocation SDA11: Land South of Paddock Way

This policy can be found on Page 167 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

☐

No (if No insert X in the box)

☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

☐

(3) Not effective

☒

(4) Not consistent with national policy

☒

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

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4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

This is part of a joint submission by [Petersfield Climate Action Network](#) (PeCAN) and the [Petersfield Society](#).

We consider Policy SDA8 to be unsound for the reasons set out in the paragraphs below.

Access to the Site

Nothing is said about access to the SDA11 site in the Policy Requirements or the supporting text, but the map of the site indicates that the site will be accessed from Paddock Way. The National Park's Transport Assessment does not estimate the resulting flows as it was prepared on the basis of a different scheme and offers no useful insights about the access.

Currently Paddock Way is a quiet residential cul-de-sac with walking connections where children can safely play in the street. It serves about 40 properties and connects to a small playing field and a children's play area. No 5 Paddock Way is a registered home providing care for young adults with learning disabilities.

We measured the carriageway width in two places to be 4.8 metres. Two metre wide footways are provided on both sides, except for the most northerly 85 meters past the HCC Depot where there is a single footway. Inadequate off-street parking provision for many properties and a lack of public parking bays, causes many residents to park on the carriageway, or with two wheels on the pavement (East Hampshire has high rates of private car/van ownership). This partially blocks the footway for pedestrians and the disabled, but leaves sufficient carriageway space for HGVs including

refuse lorries. Despite the pavement parking, one-way working is normal for vehicles travelling along Paddock Way. While this may suffice for a short residential cul-de-sac with low flows, it is inappropriate for all modes (cars, HGVs, pedestrians and cyclists) accessing a 124 bed unit care home or residential institution, especially in view of the embedded habit of some residents of street parking.

190 trips daily trips were forecast for a similar but smaller development of 97 C2 units in Harrier Way, Petersfield. This illustrates demonstrates that large complexes of C2 housing generate hundreds of vehicle trips a day. Tertiary streets such as Paddock Way do not provide adequate access to the proposed new development, especially for HGVs, large vans and emergency services. Such a volume of traffic is not compatible with Paddock Way remaining a pleasant, safe, walkable and cyclable neighbourhood. Rather a significant volume of traffic would degrade the quality of life for the residents of Paddock Way and threaten the safety of children and adults with learning disabilities. The proposed access to the site is not adequate for vehicles, walking or cycling access to the proposed car home. To ensure the safety of the residents of Paddock Way a more suitable access should be found to this site.

Active Travel for the Less Mobile

The needs of the older people who wish to walk or cycle should be highlighted in the Policy text or the supporting text or the relevant local plan policies, in order to ensure compliance with national planning policy (NPPF (Dec 2024) Paragraph 117 b).

Walking is the most readily available exercise for elderly people and that it is valuable for their physical and mental wellbeing. However the quality of the pavements and paths is critical (adequate width, smooth surfaces to accommodate wheelchairs and walkers, etc). Increasingly the disabled and elderly are using bespoke designs of cycle/e-bike. The role of cycling as an aid to mobility is often overlooked, such that the access and storage provided by developers is unsuitable.

(Sources: Barton et al, Shaping Neighbourhoods, Third Edition, Routledge (2021), Sections 3.15 and 3.16. of DFT's, Inclusive Mobility, 2021)

Drainage and Flooding

In Requirements 3 and 8, SuDS (Sustainable Drainage systems) are mentioned in keeping with the National Standards for (NPPF 2024, Paras 164, 181 & 182), which require SuDS to be prioritised in the planning of all housing developments. The necessity for this being to mitigate run off from buildings within the development, in addition to surface water runoff. However, the wording used in these paragraphs is not strong enough as it fails to emphasise the absolute necessity for long-term maintenance, a key factor without which SuDS is rendered ineffective. Indeed, the CIRIA SuDs manual (Woods Ballard et al., CIRIA C753, 2015) makes it clear that regular inspections and maintenance are necessary maintain effectiveness. In order to ensure this happens a written agreement needs to be made stating exactly which body will be responsible for maintenance and its frequency. This is imperative as the geology of the site makes it likely that the use of soakaways would be ineffective.

There is no mention of a site-specific flood risk assessment in the requirements. Given the geology of the site there should be a site-specific flood risk assessment focusing on surface water flooding and run off beyond the site boundaries.

Full Reference to the SuDs Manual:

Ballard, B., Wilson, S., Udale-Clarke, H., Illman, S., Scott, T., Ashley, R. & Kellagen, R. (2015), The SuDs Manual, CIRIA C753, CIRIA, London.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modifications which address the arguments set out under Question 4.

An alternative access route should be found. Maps suggest that a route through part of the adjacent Highways Depot to connect this site to Borough Road is possible. A new access road could follow the northern and eastern boundaries of the Depot. Aerial photos give the impression that this site is not fully utilised. Out information suggests that both SDA11 and the Depot are owned by Hampshire CC.

Close attention should be paid to cycle routes, as well as pedestrian routes towards the Town Centre in view of the distance. The needs of the older people who wish to walk or cycle should be mentioned in the Policy text, or the supporting text, or the relevant local plan policies.

Requirement 3 should re-drafted to read (NPPF, 2024, para 182c):

Follows a sequential approach, directing built development away from flood zones 2 and 3, and provides any required flood mitigation and drainage measures and opportunities for Sustainable Drainage Systems with an emphasis on nature-based, above ground and connected elements rather than underground engineered solutions and include a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance for the lifetime of the development;

An additional paragraph of requirements should be added to address the issue of master planning . It should read:

The allocation must be master planned comprehensively, and if brought forward in a phased manner, initial phases must not prejudice the delivery of later phases;

In the supporting text reference should be made to SDW3 in addition to the existing reference to SDW2.

13 Appendix A2: Glossary

This can be found on Page 299 of the Local Plan.

2. Do you consider the Plan to be sound (positively prepared, justified, effective and consistent with national policy)?

Yes (if Yes insert X in the box)

☐

No (if No insert X in the box)

☒

If No, do you consider it is unsound because it is

(insert X (in upper case, font size 14 in black and in bold) in the box if this applies,):

(1) Not positively prepared

☐

(2) Not justified

☐

(3) Not effective

☐

(4) Not consistent with national policy

☒

3. Do you consider the Plan to be legally compliant?

Yes (if Yes insert X in the box)

☒

No (if No insert X in the box)

☐

4. Please give details of why you consider the Plan is, or is not, sound or legally compliant:

This is part of a joint submission by Petersfield Climate Action Network (PeCAN) and the Petersfield Society.

The definition of “Active travel network” on Page 299 of the Glossary is not clear and is not consistent with promoting sustainable transport solutions, as required by national policy which is set out in Section 9 of the NPPF (Dec 2024).

The definition of “Active travel network” on Page 299 does not include routes which are used for utility journeys such as for shopping, visiting GPs, visiting hospitality venues, visiting friends, etc . Such trips may be among the main reason for travel especially in urban areas where one third of the National Park’s residents live.

The definition refers to both “leisure” and “recreation” purposes, but these words have the same meaning in this context, so this sentence is repetitious. The definition should be modified to address both of these flaws.

5. Please set out the modification(s) you consider necessary to make the Plan sound and legally compliant, in respect of any soundness or legal compliance matters you have identified above. You will need to say why each modification will make the Plan sound or legally compliant. It will be helpful if you are able to put forward your revised wording of any policy or text. Please be as precise as possible.

We recommend the following modification which address the arguments set out under Question 4 about the definition of “Active travel network” on Page 299 of the Glossary.

The term “leisure” should be changed to “utility trips”, such that the definition reads as follows.

ACTIVE TRAVEL NETWORK

The network of active travel routes used by active travel users for commuting, utility trips and recreational purposes.

The following alternative phrases would also be appropriate:

- “Utility journeys” instead of “utility trips”.
- Or “Everyday trips” or “everyday journeys”

The end