Response to the Consultation on the South Downs Local Plan by PeCAN

1 INTRODUCTION

1.1 Purpose and Contents

This is a response by Petersfield Climate Action Network (PeCAN) to the public consultation by South Downs National Park Authority (SDNPA) on their Draft Revised South Downs Local Plan, which closes on 17th March 2025.

The Draft Revised South Downs Local Plan was produced by the SDNPA in its role as the local planning authority, to set out identify where future development will take place, such as new homes and locations for business growth, as well as local requirements (policies) against which planning applications will be judged.

This document contains comments about some policies, supporting documents and development sites which were prepared by a small team of the PECAN volunteers. The South Downs Local Plan covers a wide range of policy topics, but the scope of PeCAN's response was constrained by our resources. Whilst our comments are prompted by our focus on the Petersfield area, we feel that most are also relevant across the whole of the National Park, especially other market towns and larger settlements such as Midhurst, Petworth and Lewes.

Our comments cover the following topics:

- The vision and objectives chapter.
- Policies: SD5, SD11, SD13, SD17, SD19, SD20, SD21, SD22, SD48, SD49 and SD51.
- Supporting documents.
- Three site allocations in Petersfield.

A table of contents is provided on Page 3 to help readers understand the structure of this document and to see the content of each section.

We are grateful to the planning policy team at the SDNPA for providing the opportunity to comment. We would welcome an opportunity to discuss our comments with the Team.

Petersfield Climate Action Network (PeCAN) is an environmental charity run by local residents in Petersfield. PeCAN's mission is to help Petersfield and surrounding villages reduce their carbon emissions and protect nature. Currently there are about 1,600 subscribers on PeCAN's mailing list and over 2,000 "followers" on social media. PeCAN has 50 active volunteers of which 10 are trustees and was registered as a charity in 2020 (charity number 1192778). More information about PeCAN can be found here: https://petersfieldcan.org

1.2 Overview of Our Response

We strongly welcome the firm draft policies on Climate Action in the Draft Revised South Downs Local Plan, ie SD2: Regenerative Design, Ecosystem Services, and Environmental Net Gain, SD48 Climate Change and Sustainable Use of Resources, SD51 Renewable Energy, SD14 Climate Change Mitigation and Adaptation of Historic Buildings. It is really encouraging to see the draft revised Local Plan take a much more robust line on these issues. We explain below our reasons for supporting these and have suggest some minor improvements.

We have identified a need for improvements to some other policies which are also crucial in the path to Net Zero and these we have reviewed in detail. These are summarised below.

The overall vision should include a reference to climate change mitigation. The Water and Pollution policies are crucial to creating a more resilient local environment, and it is important that new development is resilient to future climate scenarios, such as droughts, higher summer temperatures and extreme weather events. Hence we welcome Polices SD17, SD49 and SD50 and we have provided comments to further improve these policies.

Trees and natural green spaces are essential features of the urban areas (including Petersfield), where one third of the population of the National Park live, as well as a crucial part of the rural landscape of the South Downs. For the most part, we support the new draft of SD11 (Trees, Woodland, and Hedgerows), but we recommend that this key policy is further strengthened and clarified, with developers in mind.

Transport is the biggest source of greenhouse gas (GHG) emissions in the UK and is vital to everyday life. Poorly located and connected new developments seriously hinder healthy lifestyles. Further refinement of the four transport related policies (SD19-SD22) is recommended to clarify these policies and to encourage well-designed infrastructure for walking, cycling and the use of public transport to the maximum extent.

When recently reviewing local planning documents, we have noted a potential for greater coordination in relation to transport and spatial planning. This is important, as without coordination, neither highway authorities nor the planning authorities will be able to deliver new housing which provides residents with transport choices beyond the use of private cars.

While reviewing selected local sites, we found that the main desire lines for everyday utility trips on foot and cycle have been overlooked, with too much focus on the local Public Rights of Way (PRoW) network.

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2 COMMENTS ABOUT THE VISION AND OBJECTIVES CHAPTER

2.1 The Vision

We are surprised that the draft vision still does not mention climate change mitigation. The current Partnership Management Plan says that the Park should improve its mitigation of climate change and climate change mitigation appears in several of the draft policies in the present consultation. Mitigation should therefore be explicitly mentioned in the vision. We suggest adding the words "…and helping to mitigate climate change" at the end of the first paragraph.

It seems likely that this would be supported by residents: in the July-Sep 2024 Consultation, insufficient mention of climate change and net zero was the most frequently cited reason for people to say they were not happy with the vision and objectives (please see "Local Plan Review – Early Participation Report", page 7).

We are happy with the rest of the vision statement.

2.2 The Strategic Objectives

Objective 6 could be clarified in one respect. It reads "*To adapt well to and mitigate against the impacts of climate change and other pressures*", however in this context mitigation should refer to causes and not to impacts.

We suggest adding the words "…causes and…" so that Objective 6 becomes: "To adapt well to and mitigate against the causes and impacts of climate change and other pressures."

3 COMMENTS ABOUT POLICIES

3.1 Comment About Strategic SD2: Regenerative Design, etc

We welcome the expansion of this policy to include regenerative design and environmental net gain.

The practical impact should include that the Ecosystem Services statements, already required in Paragraph 2, will become more useful: instead of merely listing good and bad impacts, they would need to show environmental benefits. This should encourage developers to consider sustainability outcomes more actively than they might have done otherwise.

We support the additions relating to nature recovery, improvements in energy efficiency, circular economy and active travel for the same reason.

3.2 Comment About Strategic Policy SD5: Design

Our quality of life depends on various factors but prominent among these is transport and being able to easily have access jobs, shopping, leisure facilities, and services. Government policies encourage a sustainable approach to transport within spatial planning. The National Planning Policy Framework (NPPF) requires that "*Transport issues should be considered from the earliest stages of plan-making and development proposals…"* As the purpose of Policy SD5 is to ensure that all development is of the highest possible design quality[1], then the need to design to minimise the need for travel and facilitate the use of sustainable transport modes should be prominently highlighted. In view of this, we did not expect that the only references to transport in the revised version of SD5 was an obscure reference to "routes for people" in Part 1(b) and a paragraph about the storage of transport related equipment in Paragraph 1 (g).

We recommend that a new paragraph is added to Policy SD5 to cover the need for development proposals to facilitate the use of sustainable transport modes (give priority to active travel routes and good access to public transport) and take account of the environmental impacts of traffic and transport infrastructure.

3.3 Comments on SD11: Trees, Woodland, and Hedgerows

3.3.1 General Comments About Policy SD11

For the most part, we support the new draft of SD11, but recommend further refinement to strengthen and clarify this key policy. Trees and green spaces are an essential part of the urban areas where one third of the population of the National Park live, as well as a crucial part of the rural landscape of the South Downs.

We propose that references are added to BS5837, which is referenced in SDNPA Adopted Design Guide Supplementary Planning Document, (June 2022). Recent evidence demonstrates that letting nature take its course is not a reliable method for replacing trees lost through development, see our comments below about Part 7 and Section 3.3.4.

As the scope of this policy has grown to include scrub, the title should be changed to reflect this, ie "Trees, Woodland, Hedgerows and Scrub".

We recommend that numerous policy statements in SD11 are improved. The changes that we recommend can be seen in Section 3.3.3, they are shown in red.

3.3.2 Detailed Comments About SD11

Part 1. Please see the minor edits shown in Section 3.3.3 below.

Part 2. Please see the edits shown in Section 3.3.3. The terms we have used emanate from BS5837:2012 and are currently under revision. SDNPA should seek to update this section with due attention to what the final version of the revised Code of Practice will say in these respects.

[1] From Paragraph 5.21 of the South Downs Local Plan Adopted 2 July 2019 (2014–33).

The concept of competency has been introduced with reference to Biodiversity Net Gain Assessments[2] and it also resides in contamination land assessment and regeneration. We think that it is important to include it here, as shown in Section 3.3.3.

Part 3. Provision for maintenance is essential and so we have added this, see Section 3.3.3.

Part 4.The terms "ancient trees" and "veteran trees" should be added to the Glossary and supporting text with reference to legal or commonly accepted definitions. We have clarified the text about the size of the buffer zone using text from the consultation revision of BS5837:2012.

Parts 5 and 6. Please see the edits shown in Section 3.3.3 below.

Part 7. Much is spoken and written about the purity of letting nature take its course, but very recent evidence demonstrates that this is not a cast iron method for replacing trees lost through development, and it could be used as a route to do very little by those with the responsibility for doing much more.[3] It's vital that developers are held to account during the first years they are actively involved on site - that is why insisting on visible, tried and tested methods such as tree planting to best practice standards is a preferred way forward - results can be monitored and bad practice can be picked up and enforcement can be put in place. This is very difficult with natural regeneration. See Section 3.3.4 for further discussion of this topic.

The comment about competency above about Part 2 also applies to Part 7.

The need to consider suitability of trees for future climates is already part of the UK Government's UK Forestry Standard[4] and is applicable for all planting schemes. Reference should be made to this important policy document. It also supports the point made in another comment about the inappropriateness of focussing solely on native species - many of which will be severely challenged by changing climates in years to come (some already are challenged). Hence the restriction to 'native' only is entirely unacceptable, and counters the statement in the Adopted Design Guide: C.9.2.35 "*In urban and developed settings, effective use may also be made of non-native species or varieties where their essential characteristics provide functions, including visual attractiveness and ecosystem services, that are better suited to their particular context and surroundings.*"

The reference to "climate change adaption" in the penultimate sentence is not understood. Maybe it is referring to urban climate change adaptation but it doesn't say so. The biggest role for urban trees in the future is likely to be providing cooling and shade for those living, in and around, new developments. The focus purely on nature needs to be reconsidered because this paragraph is confusing.

The last sentence is far too loose a statement when compared to NPPF (December 2024) and the Adopted Design Guide. Para 136 of the former says "*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users*."

3.3.3 Revised Policy Text Including Edits Which Take Our Comments Into Account

The following text is a revised version of SDNPA's text which has been edited to take our comment into account. Our edits are shown in red.

1. Development proposals will be permitted **only** where they **seek to** conserve and enhance **existing** trees, hedgerows, and woodlands and scrub.

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[2] See: https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf)

[3] Bauld et al, Assessing the use of natural colonization to create new forests within temperate agriculturally dominated landscapes, Restoration Ecology Vol. 31, No. 8, e14004, November 2023.

Forestry Commission, EWCO Grant Manual, v3.9 published 08/10/2024.

[4] See: https://www.gov.uk/government/publications/the-uk-forestry-standard

2. Development proposals that affect trees, hedgerows, ~~and~~ woodland and scrub must demonstrate that they have been informed by ~~a~~ full site surveys, including an appropriate Ecological Survey, Arboricultural **Surveys, Impact Reports and** Method Statement, and associated Tree Protection Plan **according to BS5837**, and include a management plan, **for approval, which covers their maintenance and protection into the foreseeable future. Such surveys must be undertaken by competent personnel , i.e. someone with relevant qualifications, training, or experience in ecological fields, or with knowledge and experience to undertake arboricultural surveys such as a chartered forester or accredited arboriculturist**.

3. The removal, loss or deterioration of protected trees, groups of trees, woodland or hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy, and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required. **Such trees will be subject to the conditions in the management plan to ensure that they thrive and grow.**

4. Development proposals must provide adequate protection zones and buffers around hedgerows, scrub, ~~and other~~ woodland and trees to prevent damage to root systems and taking account of future growth. A minimum buffer of 15 metres will be required between the development and ancient woodland. For ancient trees, or veteran trees including those on a woodland boundary, the buffer zone should be at least 15 times larger than the diameter of the tree **at 1.5 m height**, or at least 5 metres from the edge of the canopy, whichever is greater. It must be demonstrated that the buffer is suitable to retain the natural growing processes and minimise indirect impacts.

5. **A proposed** loss or damage of non-protected trees, woodlands, community orchards, or hedgerows, or scrub should be avoided **if at all possible, especially those identified as Category A in a BS5837 tree survey (see section 2 above).** ~~and if~~ **If** demonstrated as being unavoidable, appropriate replacement or compensation will be required and opportunities should be taken to reuse wood on site as part of the public realm or deadwood for biodiversity. Opportunities should be taken to retain existing deadwood on site, **except where an unacceptable level of wildfire risk is identified by an authoritative agency such as the Fire & Rescue Service.**

6. Development proposals must demonstrate that appropriate protection measures for existing and proposed trees, woodlands, hedgerow and scrub are in place prior to any **development ~~work on site throughout the development process~~** as part of a comprehensive **~~landscaping~~ arboricultural impact assessment and tree protection** plan **according to BS5837**, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, ~~and~~ hedgerows and scrub are identified and incorporated **in the management plan.**

7. **Where** opportunities **genuinely exist for natural regeneration of trees on site, these** should be identified **by a suitably qualified and competent authority**, and incorporated **in the management plan. Plans** for **~~natural regeneration~~**, restoration or planting of new trees, woodlands~~, and~~ hedgerows and scrub, increasing tree canopy and enhancement of ecological connectivity with the surrounding landscape **must be clearly given**. 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~~** species contribute to climate change adaptation and be informed by and contribute to local character and the historic environment, and enhance or create new habitat linkages. New streets should be tree-lined where appropriate to the local character.

3.3.4 Natural Regeneration and Natural Colonisation

Natural Regeneration is described as "*the process by which woodlands are restocked by trees that develop from seeds that fall and germinate in situ*".[5] Natural Colonisation (NC) is the process of woodland establishment on previously unwooded sites that relies on the production of tree seed from trees close to the location of the new woodland.

It is unlikely that the new development of sites for housing etc will create circumstances where natural regeneration is required, let alone a viable option, for creating tree cover or woodlands. It is more likely to be appropriate in the context of woodland or forest management of previously wooded sites. Even on such sites, restocking by natural regeneration is often unsatisfactory, as stated in the reference cited in previous footnote.

[5] See: https://www.forestresearch.gov.uk/research/lowland-native-woodlands/natural-regeneration-of-broadleaved-trees-and-shrubs/

Natural colonisation relies heavily on:

(a) the production of tree seed from trees sufficiently close to the location where new woodland is sought,

(b) seed dispersal and movement to the chosen site,

(c) effective seed germination, and

(d) unhindered seedling growth to sapling stage and beyond.[6]

The need for active management intervention makes NC more risky than tree planting, given that developers often lose interest and delegate responsibility after the built structures have been sold on.[7] The science, provided in the well-researched paper by Bauld et al (see the footnote on Page 6), demonstrates that NC simply can't be relied on to produce the results that residents will need. Instead, and based on a version of the polluter pays principle, local planning authorities must now enforce the most robust methods of establishing green infrastructure in and around new development, including readily accessible and understood management plans.

3.4 Comment About Policy SD13: Listed Buildings and SD15: Conservation Areas

There is a risk that these two policies could conflict with "SD14: Climate Change Mitigation and Adaptation in Historic Buildings", for example if energy efficiency measures such as double glazing or a heat pump require minor changes to the fabric or features of a historic, or listed building. Current guidance is only that these policies should be read alongside each other. We suggest clarifying that SD14 would take precedence in the event of a clash.

This could be achieved by adding the words "Subject to SD 14,…" at the beginning of SD13 and SD15.

3.5 General Remarks About Water Policies: SD17, SD49, and SD50

In overall terms, PeCAN strongly supports the draft policies related to water (SD17, SD49, and SD50). In the context of a rapidly changing climate and shifting local weather patterns, for example hotter dryer summers and more extreme rainfall in autumn and winter, it is imperative to make new development future proof as far as is possible. Growing evidence suggests that this part of the South East will be extremely water stressed and that poorly designed or located new development in the National Park could put unsustainable pressure on water resources and trigger further deterioration of catchments already suffering from low flows, flash flooding and pollution from agriculture and sewage overflow.

It is noted that the draft Local Plan (NEW4) includes a requirement for a per capita water consumption not exceeding 85 litres/day for the Sussex North Water Resource Zone. We realise this is in response to Habitats Regulations and the need to safeguard the Arun Valley SPA/SAC/Ramsar site. However, it can be argued that a challenging limit to water consumption could be more broadly applied in a National Park which already faces multiple pressure upon the catchments and aquifers which make up an important component of its special quality, ie is all water stressed. This would put the National Park in the forefront rather than waiting reactively for any nationally applied standards as implied in the text at 7 on Page 32.

3.6 Comments About Policy SD17: Protection of the Water Environment

Under key issues the emphasis on a catchment approach is welcomed. There is a broad move towards a more catchment based approach in water policy and in the National Park many landowners, conservation bodies and agencies are working to begin to restore more natural river functions and reconnect floodplains to river channels.

These catchment initiatives include the Western Rother and its tributaries so future development in and around Petersfield (as well as Midhurst and Petworth) has the potential to either facilitate or become a

[6] From an unpublished book on woodland creation by the Forest Research for the Community Forest Trust.

[7] K Chapman et al, Lost Nature - Are housing developers delivering their ecological commitments?, 2024.

barrier to restoring these water bodies. Although the specific references to the national importance of chalk rivers and streams is supported, it should be noted that the Western Rother, the only river to run wholly within the National Park, is not a chalk stream. Rather, it derives its unique character from, and faces many problems because, it runs between the chalk and greensand in an often deeply incised channel prone to sedimentation. Because of this it deserves specific mention under key issues.

The positive reference to new water features is welcomed not only as part of new development but in the wider landscape. River restoration in the National Park already includes examples whereby new features have been created (eg wetlands or more natural channels) and these should be viewed positively if their creation contributes to the catchment approach by creating a more naturally functioning system. A specific issue with the Western Rother and its tributaries is the combination of flash flooding and erosion[8] in winter coupled with low flows in the summer. The creation of new water bodies on farmland could provide winter storage, reducing flooding in built up areas and evening up flows by reducing the need for agricultural abstraction in summer.

Under the Policy SD17 itself the reference under Paragraph 2. "conserve, enhance and where possible restore" is welcome. It might be useful to refer to some specific examples and policy guidance here to assist developer who may not be familiar with best practice. The Environment Agency and the Rivers Trusts would be a useful source of material.

Under Paragraph 2.(c)), it would be useful to include reference to the Western Rother, our "National Park river", as well as to chalk streams (see above).

Terms such as "*connectivity pathways of surface waters*" (in Paragraph 3) or "*adequate zones and buffers to watercourses*" (in Paragraph 5) would benefit from references to specific standards or to best practice examples.

Under Paragraph 8, we support the positive wording around reservoirs or natural flood management measures (see above).

3.7 Comments on Policy SD49: Flood Risk Management

Under key issues it is worth referencing the scenarios set out within the Met Office UK State of the Climate Reports as these provide a robust evidence base on how weather patterns are changing and are likely to change including data related to this part of England. See also Paragraph 1 a) within draft policy. These reports provide useful context for many aspects of climate proofing of new development and are therefore relevant to many other policies in the Local Plan.

Under SD49 itself, and as with comments on SD17 above, it would be useful to include references to some specific examples of best practice from around the country, eg ones that meet Paragraph c) ii by being "*informed by and positively contribute to landscape character, prioritising natural flood management features and nature-based solutions….etc*".

3.8 Comments About Policy SD50: Sustainable Drainage Systems

This section is well evidenced by reference to the CIRIA SuDs manual and the principles are supported. As with previous comments, it is worth noting that the Western Rother catchment, for which the SDNPA has a particular responsibility as it flows entirely with the National Park, is known nationally as a river which is extremely vulnerable to sedimentation and soil erosion due to its hybrid chalk/sandstone geology. Coupled with the familiar problems of storm overflows from water treatment plants, this makes the need for sustainable drainage systems even more essential than might be the case elsewhere.

Given the above, the strong wording of this policy, in particular the detailed points under Paragraphs 3 a) to e), are particularly welcome.

[8] There is a body of evidence about soil erosion in the Rother catchment of which this journal article is a recent example: Hudson et al, Soil erosion risk for farming futures: Novel model application and validation to an agricultural landscape in southern England, Environmental Research 219 (2023) 11505, see: https://doi.org/10.1016/j.envres.2022.115050

3.9 Comment About Policy NEW1: Accessible Homes

It is unclear whether the scope of this policy applies to the internal design of buildings/homes, or whether it covers a) external access to homes (access to external doors, outdoor spaces, design of cycle parking and garages) b) routes in the neighbourhood of homes for accessing services and green space. It would be helpful if this was clarified.

For older and disabled people, the quality of the pavements and paths is important, if not 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. Cycle routes must be accessible by trikes, hand cycles etc.[9] These topics are linked to parts of SD19-SD22 and so a cross-reference may be appropriate.

3.10 General Remarks About the Transport Policies: SD19, SD20, SD21 & SD22

3.10.1 Introduction

In overall terms, PeCAN supports the draft policies related to transport (SD19, SD20, SD1 and SD22). We welcome the changes to these three policies but further refinement is recommended to clarify and strengthen the policies to give planning officers better leverage and to more fully explain the policies to developers.

The four sub-sections below contain recommendations that apply to all three policies. This is followed by Sections 3.11 to 3.14, which contain comments specific to each policy and comments about SD22.

A large volume of transport studies, manuals about transport infrastructure and government policies have been published since the current Local Plan was prepared. We have referenced some of these in our comments which are set out below.

3.10.2 Headings and Content of the Transport Policies

The readability and accessibility of the transport policies SD19, SD20, and SD21 could be improved by changing the policy titles to more clearly reflect their content and by interchanging some policy statements. The following are examples of the limitations with the policies as currently proposed:

- SD19 has accessibility in the title, but accessibility criteria are also found in SD21 Part 3 and in SD20 Part 2.
- SD20 Part 6 and SD21 Part 3 partially overlap.
- Measures for protecting existing roads and routes are found under all three policies; SD19, SD20 and SD21. SD19 Part 3 deals with the protection of the current road network, while protecting road users is specified in SD21 Part 3 and protecting NMU routes in SD20 Part 1.

It is recommended that the clauses within SD19, SD20 and SD21 are re-organised under new headings. Some of the heading used in the North Lincolnshire local Plan are useful, for example: location of development, access to development (sites), pedestrians routes and footpaths etc.

3.10.3 New NPPF Policy About Pre-App Discussions (Policies SD19 and SD21)

Since the 2018, the NPPF has specified that *"Transport issues should be considered from the earliest stages of plan-making and development proposals, …"* and: "*this should involve …..e) identifying and pursuing opportunities to promote walking, cycling and public transport use"* from Paragraph 109 of NPPF (December 2024).

Unless opportunities for active travel routes are identified from the earliest consideration of the spatial layout opportunities may be lost for new walking and cycling connections to developments. We recommend the addition of a policy statement which requires (or strongly recommends) that opportunities for walking and cycling routes be identified and discussed with planning officers during the earliest stages of the design (at pre-app or well before the formal application). Active Travel England (ATE) have reported that they are

[9] DFT, LTN 1/20.

developing a pre-application advice service suggesting that they recognise the importance of pre-app discussions on such topics.[10]

Often the local community are the best people to highlight opportunities for new active travel routes and so they should be involved in this process.

3.10.4 The Supporting Text & Providing Concise Descriptions of the Required Outcomes

LTN 1/20 is mentioned under the heading "Supporting Text" for SD20. This useful document is relevant to SD19, SD21 and SD22, in addition to SD20.[11]

Other manuals about the design of infrastructure for walking and for designing for the disabled should be identified. The following are widely referenced by highways authorities in local transport plans, in addition to LTN 1/20:

- Department for Transport (DFT), Inclusive Mobility, 2021.
- DFT, Manual for Streets, 2007.
- Chartered Institution of Highways & Transportation (CIHT), Manual for Streets 2, 2010.

Various web pages and documents by ATE provide excellent guidance on designing infrastructure for active travel, and for assessing designs.[12] Their guidance includes clear example of the features required to facilitate active travel, see this webpage.[13] Examples of relevant features and characteristics which are often appropriate should be listed in the supporting text.

Hampshire County Council has prepared and published a useful set of technical guidance notes relating to the highway network, new developments and active travel routes.[14] These draw on DFT manuals and provide additional detail.

Several policies use phrases (some taken from the NPPF) that require subjective interpretation and which are not sufficiently specific to ensure the intended outcomes, or allow compliance to be assessed, or to drive change. For example, "attractive and accessible non-motorised user links through the site" and "that are suitable for walking/wheeling, cycling …". Such phrases would be less ambiguous if replaced by text referring to a relevant manuals by DFT, while emphasising the need for compliance.

3.10.5 Key Issues For Transport Policies SD19, SD20, SD21 and SD22

Under each policy a bulleted list of key issues has been provided. We recommend that the lists of key issues related to transport policies SD19 to SD22 is expanded to include the following:

- Transport is the highest GHG emitting sector in the UK. See Sections 4.2.3 to 4.2.7 for a more complete explanation of this bullet point and the bullets below.
- The South Downs is under huge pressure from car use. Traffic volumes have grown and are forecast to keep growing. The average size of vehicles has increased. This has a major impact on both our natural and built environments. There has been a long term decline in investment in public transport. Access for those without cars and for disabled people is becoming increasingly difficult, as acknowledged the IIA Appendix A (October 2024, see Pages 13, 16 & 17).
- The impact on health of poor connectivity of housing is increasingly documented and recognised.
- Town centres dominated by traffic movements have a negative impact on ambience, safety and air quality.
- There is a lack of connectivity for active travel within the National Park.

[10] ATE, Development Management Procedural Note for Local Planning Authorities, 2023.

[11] The most relevant sections include Chapter 14 contains guidance on cycling provision for new developments, while Figure 4.1 provides a simple quantitative method of assessing whether access roads near a development are suitable for cycling, or whether the traffic speed and levels are such that the provision for cycling is inadequate. Chapters 3-10 provide copious information on the detailed design and construction of on- and off-road routes. Chapter 11 contains guidance on cycle parking.

[12] https://www.activetravelengland.gov.uk

[13] https://www.activetravelengland.gov.uk/planning-active-places/site-wide-considerations

[14] https://www.hants.gov.uk/transport/developers/technical-guidance

In view of the above, the transport related policies (SD19, SD20, SD21, and SD22) should facilitate well-designed infrastructure for walking, cycling and the use of public transport to the maximum extent.

3.11 Comments About Policy SD19: Transport & Accessibility

These comments are in addition to the general comments provided in Section 3.10 above.

Parts 1 and 2 are key policies which we support, but they are undermined by a lack of clarity. We would like to see policies that require sites to be assessed against quantifiable measures for active travel connections to new developments, based on methods developed by ATE. ATE recommends that local planning authorities should require the completion of their spreadsheet proforma (toolkit) containing a checklist.[15] Also that the policy statements (and the supporting text) are clarified using some of the recent published guidance and evidence.

PeCAN recently reviewed a planning application that quoted a document published in 2000 which suggested that most people will walk 4 km to access services, but recent studies demonstrate that few will walk further than 800 metres each way and that bus stops should be within 400 metres, according to Sustrans.[16] The Sustrans report shows that planning decisions are often made without regard for evidence about the distances that people are willing to walk to services. The supporting text for SD19 should specify walkable and cycleable distances to various categories of destination (the distances can be readily measured using desk top tools such as Google Earth).

Part 2 mentions "the cycle network" but in the UK we lack a nationwide cycle network that is controlled and maintained by central or local government. There is only the so called "National Cycle Network" (NCN) that is controlled by Sustrans, which is a charity which lacks resources. Often the NCN does not deliver the connectivity for active travel that is suggested by maps of NCN routes. The character and quality of NCN routes varies hugely, and whilst 54% of the Network is Good or Very Good, 46% is Poor or Very Poor.[17] A further problem is that the NCN was designed to provide connections between cities and towns, rather than routes within them which connect to services. "*Places suitable for active travel require a range of local services and community facilities that are conveniently located on high-quality, accessible walking and cycling routes*" according to ATE. ATE recommends that an assessment be completed of the design and accessibility of existing active travel routes in the area of the sites.[18]

Part 3 covers the safety of roads, but may be interpreted as only applying to vehicles. Safety issues arising with off-road routes (PRoWs, informal paths, cycleways) are not mentioned. The text should be clarified to specifically include the disabled, pedestrians, cyclists using highways and off-road routes.

Part 4(d) covers improved cycling parking. Petersfield Town Centre lacks adequate covered and secure cycle parking,[19] as do many other centres of towns and large villages (the roof of the cycle storage at the Station is inadequate, as is often the case with the standard design used by Network Rail). This policy text should be changed to encourage covered cycle parking.

The expansion of public charging points could play an important role in de-carbonising the transport sector, according to the Climate Change Committee.[20] Improvements to public charging points should be supported, alongside the other measures in Part 4 of SD19.

"Future Considerations" SDNPA mention ATE new role as a statutory consultee but this role will be very limited in this case as it is limited to large developments, of which there are few within the National Park.

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[15] Active Travel England Standing Advice Note: Active travel and sustainable development, 2024.

[16] Sustrans, Walkable neighbourhoods, 2022. (We believe that this this document is consistent with ATE guidance on this topic).

[17] This is according to Sustrans own assessment reported in Paths for Everyone, Sustrans' review of the National Cycle Network, 2018. Also see Laura Laker, Potholes and Pavement, Bloomsbury, 2024.

[18] See: https://www.activetravelengland.gov.uk/planning-active-places/site-wide-considerations

[19] Cycle Parking Survey and Count in Petersfield, 2023. This can be found here:

https://petersfieldcan.org/media/einfkuk3/ptrsfld-cycle-parking-survey-count_v21_06-09-2023.pdf

[20] "CCC: Reducing emissions 87% by 2040 would help 'cut household costs by £1,400" published in February 2025 and viewed on https://www.carbonbrief.org

3.12 Comments About Policy SD20: Walking, Cycling & Equestrian Routes

These comments are in addition to the general comments provided in Section 3.10 above.

Parts 1. We recommend that "the safety" is added after amenity value.

Part 2. Constructing the routes themselves may pose challenges, but another challenge is connecting the routes to the road network and town centres so that people can easily reach the routes along former railway lines, without using cars. Part 2 should be reworded to include a wider range of circumstances. We suggest: "…will be permitted provided they connect, or facilitate links to, and contribute to the network of ….".

Parts 3 and 4. We strongly support these policies. Off-road routes such as the Centurion Way are valuable assets for local communities and for people who wish to visit the National Park. Currently there is a shortage of 'family friendly' paths that are suitable for inexperienced cyclists and vulnerable users.

Part 6 contains the terms "non-motorised user links" and "network of non-motorised user routes". It would be clearer to use the phrase "routes for walking, wheeling and cycling."

Part 6 fails to mention several key aspects of the design of routes for walking and cycling within developments that are included within NPPF Paragraph 117. Part 6 should be edited to include text about the following:

- First priority should be given to walking and cycling routes when considering site layouts.
- Facilitate access to public transport.
- Minimise the scope for conflict between pedestrians, cyclists and vehicles.

3.13 Supplementary Questions About Policy SD20

The following supplementary questions are provided about SD20:

1. Should we include a criterion about wayfinding infrastructure?
2. Should we include a criterion or supporting text about path materials and widths?

The first question should be directed at highway authorities in the first instance. It should be noted that the wayfinding signage for the routes of National Cycling Network is inadequate,[21] as users of these routes will know only too well.

Regarding the second question, we recommend that this topic is discussed in supporting text because developers often propose paths with inappropriate surfaces and they seldom volunteer to construct paths of adequate width. This is in the context of new developments, rather than in relation to off-road routes along former railway lines, where other considerations may apply.

The choice of path surface should be based on a range of criteria, including the location and type of users (mode of travel, utility journeys or recreational trips), usage levels, local conditions (leaf fall, drainage, soil type etc). The lower up-front cost of unsealed surfaces may appear to be attractive, but the whole-life costs are likely to be higher. Unsealed surfaces can become unusable for utility journeys after only 2-3 years. Furthermore, we are also concerned that developers often propose the use of herbicides to maintain unsealed surfaces.

Non-sealed surfaces are prone to becoming muddy over time, especially under trees. Many of the off-road sections of NCN 22 near Petersfield are unusable for much of the year and generally unsuitable for utility cycling. While rough and muddy paths are generally adequate for those undertaking recreational trips, arriving in a muddy condition is not acceptable for school, or for work, or when visiting shops, restaurants etc and so unsealed surfaces are not appropriate in urban or edge of town neighbourhoods. Heavy rainfall events have become more prevalent with climate change and this can cause unbound surfaces to be washed away on gradients. The surfaces used along the Centurion Way demonstrate that there may be little aesthetic difference between a gravel surface and a bitumen based surface with an appropriate top layer. Guidance on surfaces can be found in various documents, including LTN 1/20.

[21] Laura Laker, Potholes and Pavement, Bloomsbury, 2024.

3.14 Comments About Policy SD21: Public Realm, Highway Design & Public Art

This comment is in addition to the general comments provided in Section 3.10 above.

Part 3 of SD20 specifies that the design and layout of a new development must give priority to active travel. However this wording is more restricted than that in the NPPF. NPPF Paragraph 117 Part (a) specifies priority is given to pedestrian and cycle movement both within the scheme *and with neighbouring areas*. This approach is more likely to result in satisfactory connections from a development site to local services.

3.15 Comments About Policy SD22: Parking Provision

Please see remarks about covered cycling parking in the comments about SD19 Part 4d.

Part 4 (a) has our full support in view of the potential role of electric vehicles in de-carbonising the transport sector. Perhaps the phrase "wherever feasible" should be strengthened.

When reviewing planning applications, PeCAN often encounter plans that contain inadequate provision for cycling parking. Additional requirements about the following should be added to either the Local Plan or the Parking SPD:

- The size of vehicle parking spaces is specified but not the space required to park cycles. The space required for storing oversized cycles should comply with Section 7.4 of DFT's, Inclusive Mobility, December 2021. Guidance about space for storing standard cycles can be found in Cycle Parking Guide For New Residential Developments by Cambridge City Council (this useful document is referenced in the SDNPA's SPD on Sustainability).
- For communal residential buildings (flats and care homes) cycle parking should be conveniently located (near a street), attractive, and secure, rather than being round the back near the dustbin storage.
- For all but small sites, new buildings for leisure, retail and employment, should provide covered and secure cycling parking.

3.16 Comments About Policy SD48: Climate Change & Sustainable Use of Resources

We strongly support this revised policy. It will contribute to the 2nd Partnership Management Plan's ambition for a net zero National Park economy by 2040 and a 5% annual reduction in emissions, which are especially needed because household electricity emissions in the National Park are around 27% higher than for an average UK resident.

Para 1: Low operational emissions new builds are commercially feasible and popular with purchasers who benefit from lower running costs , as demonstrated by the growing number of commercial housebuilding companies offering low or zero operational carbon homes (e.g. Verto Homes, Heritage Homes, Greencore Homes, Willmott Dixon Collida).

The target space heating demand of <15 kWh/m2 is ambitious but achievable at a financially viable cost (£4,800 per new build home, versus £26,300 to achieve the same by retrofit,[22] and aligns with the Climate Change Committee's advice to government.[23] The additional construction cost of meeting this requirement would be a one-off cost that, even if passed on to the purchaser in full, would be offset by ongoing energy savings, probably within five years based on the above estimate.

We suggest that the total energy use be defined in guidance so that applicants know whether to include only regulated (mostly heating and lighting) energy or also unregulated energy (other electricity use, including EV charging, which could be significant).

We support measures in para 1(c) to reduce the burden on the grid through battery storage and net energy self-sufficiency, which should strengthen local resilience.

[22] Climate Change Committee, "UK housing: Fit for the future?", Feb 2019.

[23] ibid, recommendation 9.

The requirement for post-occupancy evaluation will improve compliance, we hope guidance will favour the use of independent and preferably LA-employed evaluators.

Para 2: Measures to limit embodied emissions are particularly necessary because embodied carbon is such a large part of the whole life carbon emissions of a dwelling. This category of emissions has not historically been a concern for the construction industry and changing this mindset and building capability will be difficult without new regulatory and/or planning requirements. A policy to limit embodied emissions would align with the Climate Change Commission's (CCC) advice to the government[24] and is expected to become a national requirement in the future.

The standards selected seem quite reasonable and could even be more stringent. For example, para 2(c) sets maximum embodied carbon levels of ≤500kg CO2e/m2 and ≤750kg CO2e/m2. These are more generous that the ≤350kg CO2e/m2 target that the government has sets for its own buildings by 2030.[25]

Para 5: The measures affecting on renovations of existing buildings is welcome because existing buildings account for far more GHG emissions than new buildings.

We suggest strengthening the current wording to address the risk of locking in fossil fuel heating systems as follows:

> "For all development proposals which involve the change of use or redevelopment of a building, or an extension to an existing building, the applicant shall describe what steps they have taken to (i) avoid extending the building's dependence on fossil fuel heating, for example by installing a new gas boiler, and (ii) is encouraged to consider all opportunities to improve the energy efficiency, overall carbon emissions, water consumption and embodied carbon across the planning unit."

3.17 Comment About Policy SD51: Renewable energy

We support the amendments to this policy and particularly welcome Paragraph 3 (community energy) and Paragraph 4 (solar on existing rooftops, carparks and brownfield sites).

[24] CCC, Independent Assessment: The UK's Heat and Buildings Strategy, March 2022.

[25] https://www.gov.uk/government/publications/the-government-workplace-design-guide/sustainability-and-net-zero-annex#sustainability-targets-1

4 COMMENTS ABOUT THE SUPPORTING DOCUMENTS

4.1 Comments about the Integrated Impact Assessment

The text in the main volume of the Integrated Impact Assessment (IIA) should be modified to take account of the comments about the appendices provided below.

4.2 Comments about the IIA Appendix A - Sustainability Issues

This document contains a useful analysis of the key sustainability issues facing the National Park but we are concerned that the sustainability issues relating to trees and transport are not adequately covered. We recommend that new rows are added to the IIA Appendix A to cover the key issues described below in Sections 4.2.2 to 4.2.7.

4.2.1 Water Resources

The Integrated Impact Statement explicitly mentions water scarcity, and discusses in some detail the issues of limits for per capita water consumption as proposed amongst water companies and within national guidance, this section should be strengthened to include other pressures. River catchments and the chalk aquifer (which provides water to over a million people mostly outside the NP) are a huge element of what makes the South Downs National Park special and much of its biodiversity is linked to these. The catchments include not only the chalk streams, but also the Western Rother and the other main rivers which cut through the Downs (Arun, Adur, Ouse and Cuckmere). The pressures upon these are complex and interconnected, including over abstraction but also diffuse pollution from sewage and agriculture, floodplains which are disconnected from the rivers, lack of natural riparian habitat, erosion and sedimentation and the presence of redundant structures which prevent the restoration of natural processes.

4.2.2 The Loss of Trees – An Issue Impacting the Landscape, Housing & Climate Change

Pests and diseases like ash dieback and Dutch elm disease are a growing concern and threat to a significant number of trees nationally, including in the South Downs National Park. The Trees for the Downs campaign is raising money to plant a mix of tree species, to providing a healthy treescape for people to enjoy and to increase resilience to climate change.[26]

Urban trees are also under pressure, including Petersfield's tree population, which is dominated by several tree species which are very vulnerable to devastating pests and diseases. Continual development also threatens trees, whether from new housing estates or simply an extension to a property or a larger driveway.[27] With one third of the National Park's population living in towns and large villages and with most development taking place here, it is important that this part of the wider problem is recognised.

The Local Plan has an important part to play to encourage developers to ensure that they are delivering pleasant, healthy and resilient developments. Trees and green space are vital components of this and cannot be taken for granted, as a recent survey commissioned by Wild Justice has demonstrated.[28]

Currently this topic is not mentioned by Integrated Impact Assessment (IIA). It is recommended that an entry about this topic is added to Appendix A and that this entry is reflected in the text of the main document.

4.2.3 Additional Transport Issue 1 – Greenhouse Gas Emissions

Surface transport is the highest emitting sector in the UK, see Figure 1. Emissions from driving and other transport in the National Park are around 26% and 21% above the UK average. Travel accounts for 36% of the residents' GHG footprint and for the majority of South Downs visitors' GHG footprints.[29] Unless this changes, the UK will struggle to meet its legal and international obligations to tackle climate change despite a transition

[26] Trees for the Downs viewed on the website of the South Downs National Park Trust

[27] Petersfield Society, Petersfield Community Tree Location Survey, 2021.

[28] Chapman et al, Lost Nature, Are housing developers delivering their ecological commitments? 2024.

[29] Small World Consulting Ltd, A greenhouse gas emissions assessment and target scenario for the South Downs National Park, June 2022

towards electric vehicles.[30] There is potential for a reduction in transport emissions in the UK, enabled by electrification of cars, vans, and HGVs (and continued progress of the power sector), together with the replacement of car journeys with buses, walking and cycling.[31]

Car use has grown steadily since the 1950s, as illustrated in Figure 2. This feature of travel behaviour has various consequences The high level of car use and car dependence contributes to the issues described below.

4.2.4 Additional Transport Issue 2 - Impact on Health of Poor Connectivity

Poorly located and connected new development seriously hinder healthy lifestyles. Physical inactivity directly contributes to one in six deaths in the UK, drives rising levels of obesity, and is the fourth largest cause of disease and disability. It costs society an estimated £7.4 billion a year[32] and contributes to the strain on the national healthcare service. Transport journeys can also create high levels of air pollution in many towns and cities, contributing to an estimated 40,000 premature deaths per year.[33] Effective planning for health can contribute to an area's economy and individual mental and physical wellbeing.[34]

There is a growing body of inactive people with health problems, especially within urban areas, who could benefit from increasing their physical activity and mental wellbeing by participating in outdoor activities.

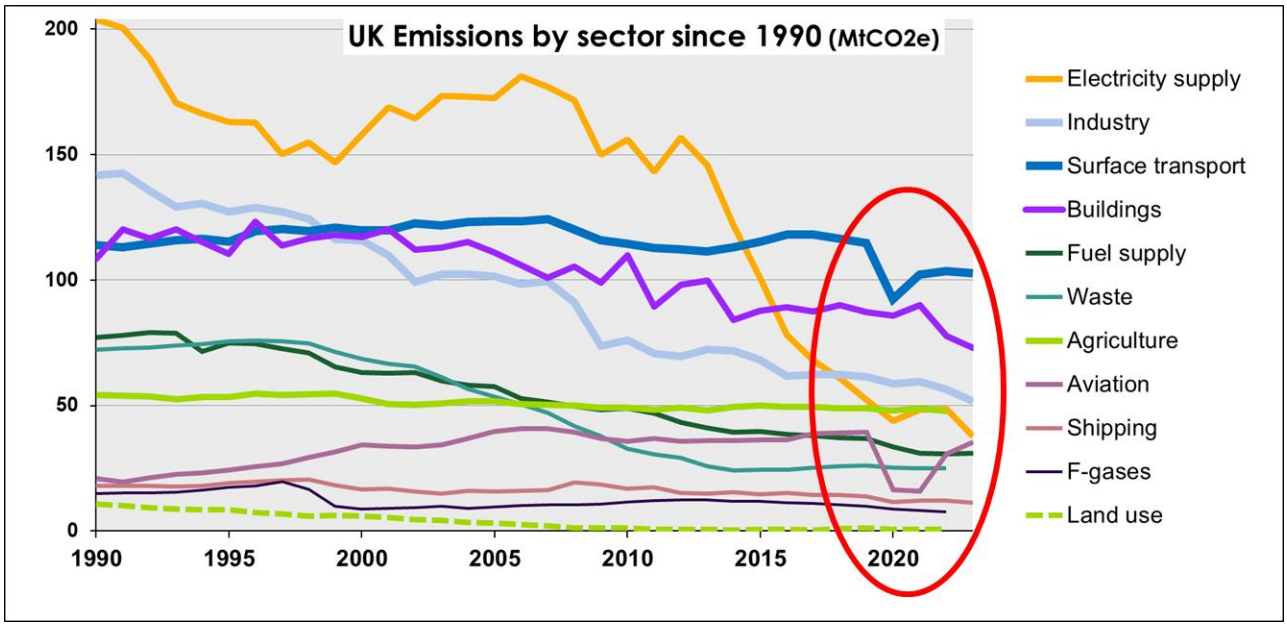

Figure 1: Surface transport is the sector with the highest emissions. This graph shows UK Greenhouse gas emissions since 1990.[35]

4.2.5 Additional Transport Issue 3 - Transport Sustainability in Urban Areas

The South Downs National Park has by far the largest residential population of all UK National Parks. One third of the population of the SDNP live in towns,[36] where there is significant potential to reduce car dependency.

[30] CIHT, Better Planning, Better Transport, Better Places, 2019.

[31] "CCC: Reducing emissions 87% by 2040 would help 'cut household costs by £1,400" published in February 2025 and viewed on https://www.carbonbrief.org.

[32] Public Health England (2017), Health matters: Obesity and the food environment, Public Health England.

[33] Whitehouse, A. (2016), Every breath we take: The lifelong impact of air pollution, Royal College of Physicians.

[34] Public Health England, Using the planning system to promote healthy weight environments, Guidance and supplementary planning document template for local authority public health and planning teams, 2020.

[35] Source: CCC 2024 Progress Report to Parliament.

[36] Calculated by comparing the population of Lewis, Petersfield including Sheet and Steep, Midhurst including Easebourne, Liss and Petworth with population of the National Park as reported in the PMP (140,881).

Two million people live within 5 km of the National Park in neighbouring towns and cities including Chichester, Winchester, Worthing, Brighton & Hove, Eastbourne and Alton.[37]

Over time, patterns of dispersed and car-dependent settlement growth, coupled with under investment in public transport and active transport infrastructure, have left many towns and cities, including some in National Park, with poor accessibility and connectivity.[38] This increases infrastructure costs and weakens labour market productivity, which prevent towns and cities from reaching their full potential.[39]

New developments present opportunities to encourage cycling, walking and sustainable travel by designing in connections for walking and cycling to town and village centres, open space etc. The challenge is to ensure that these opportunities are fully realised by working with developers and through the planning system of both the SDNPA and neighbouring Planning Authorities.[40]

As most development takes place within towns, rather than in the rural parts of the National Park, the Local Plan should be comprehensive in its coverage of transport sustainability matters in urban areas.

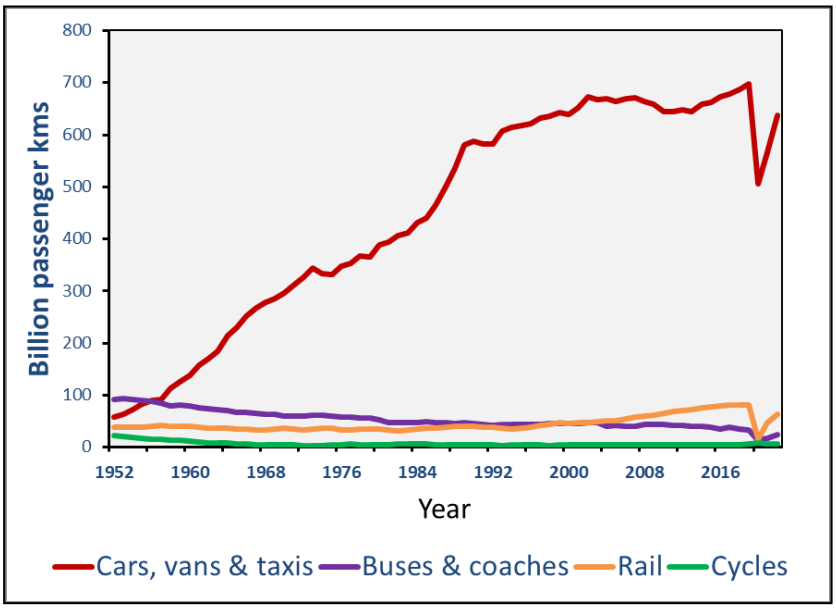

Figure 2: This graph shows passenger distance by travel mode in UK from 1952 to 2020.[41] The use of cars has grown to become the dominant mode of travel, with rail and bus only being used for a small fraction of journeys. A decline in the use of buses and cycles is evident. In this context, "passenger" means all occupants including the driver. The dip in 2020-21 was caused by the Covid lockdown.

4.2.6 Additional Transport Issue 4 - Impact on Town Centres of High Levels of Vehicle Use

Town centres dominated by traffic movements have a negative impact on ambience, safety and air quality. In Lewis, incomplete routes, or poor quality routes for active travel, on key corridors of movement are reported.[42]

The Petersfield Neighbourhood Plan reports *"…… lack of crossings, poor footway links and insufficient safe cycling paths (both on-street and off-street) from home to school and to community facilities."*

[37] SDNPA, Partnership Management Plan, 2020–2025.

[38] While there is evidence at national level of inconsistent provision for connecting new developments to existing cycling and walking routes, published material about this topic for the South Downs area is hard to find. HCC's Evidence Base (Facts & Figures) for LTP4 provides evidence of this in Hampshire. PeCAN have anecdotal evidence from developments in Petersfield.

[39] CIHT, Better planning, Better transport, Better places, 2019.

[40] SDNPA, South Downs National Park Authority, Cycling and Walking Strategy 2017-2024.

[41] Department for Transport table code: TSGB0101, 2023.

[42] East Sussex CC, The East Sussex Local Cycling & Walking Infrastructure Plan (LCWIP), 2020.

Under walking and cycling access, the Liss Neighbourhood Plan says "*There is a need to enhance the network, both to improve connections across the village and particularly to the village centre and the schools and also to enhance opportunities for recreation and enjoyment of the countryside*."

In Petworth, "*the nature of the historic town centre makes it entirely unsuitable for heavy goods vehicles which continue to cause damage to buildings and measures are required to direct them elsewhere*" with "*pedestrians are being put at risk from inadequate pavements….".*[43]

4.2.7 Additional Transport Issue 5 - Lack of Connectivity from Towns for Active Travel

Walking and cycling connectivity is often poor from market towns, bus stops, rail and bus hubs to the rural landscape of the National Park. The improvements needed maybe small scale, such as routes connecting visitor attractions with nearby bus stops, or larger infrastructure schemes such as new routes from stations.[44]

There is a shortage of 'family friendly' paths that are suitable for inexperienced cyclists and vulnerable users.[45] Often the NCN does not deliver the connectivity for active travel that is suggested by the maps of NCN routes. The character and quality varies hugely, and whilst 54% of the Network is Good or Very Good, 46% is Poor or Very Poor.[46] The Network's routes have great potential for improvement.

4.3 Comments about the IIA Appendix B - Settlement Appraisals

The supporting documents dealing with transport matters (IIA Appendix B and the document prepared by Royal Haskoning DHV[47]) assess the general locations for their potential for sustainable transport, but do not assess the relevant sites. Not all sites within "locations with potential" are, or can be made, sustainable in transport terms, hence each site should be assessed. ATE recommends that "*An assessment of the design and accessibility of existing active travel routes in the area of the sites should also be completed".*[48]

The size of the task to assess travel routes would be reduced if mature and comprehensive Local Cycling and Walking Infrastructure Plans (LCWIPs) were available, but in East Hampshire and elsewhere, this is not the case, as is recognised in the Royal Haskoning Report.

In November 2024, PeCAN reviewed a draft LCWIP for East Hampshire and noted a lack of coverage of the new site allocations from the relevant draft local plans. The lack of coordination between the site allocations, LCWIPs and transport planning in general, is a cause for concern, as without coordination we think it unlikely that this local plan will be able to deliver new housing which provides residents with real transport choices and so offer the potential for sustainable travel.

[43] Petworth Neighbourhood Plan 2015 – 2033, 2018.

[44] SDNPA, South Downs National Park Authority, Cycling and Walking Strategy 2017-2024. Also see the Outcome 3 section in the SDNPA Partnership Management Plan.

[45] SDNPA, South Downs National Park Authority, Cycling and Walking Strategy 2017-2024.

52% of adults in England selected off-road & segregated cycle paths when asked to select factors which would encourage them to cycle, 61% selected safer roads. National Travel Attitudes Study (NTAS) Wave 9: Cycling, January 2024.

[46] This is according to Sustrans own assessment reported in Paths for Everyone, Sustrans' review of the National Cycle Network, 2018. Also see Laura Laker, Potholes and Pavement, Bloomsbury, 2024.

[47] Royal Haskoning DHV, South Downs Transport Study Transport Assessment, November 2024.

[48] See this webpage: https://www.activetravelengland.gov.uk/planning-active-places/site-wide-considerations

5 COMMENTS ABOUT SITE ALLOCATIONS & ASSOCIATED POLICY REQUIREMENTS

5.1 Land at Penns Place, Petersfield (EA067)

This site is identified for a mixed use development for community, sports and residential use (35 dwellings). Petersfield needs more sports facilities and so this part of the proposal is welcomed in principle. However these facilities will be on the extreme eastern edge of the Town, with access along narrow residential roads and with only a limited weekday bus service. Parking congestion will be an issue. Currently the Taro Leisure Centre, the Rugby Club and the adjacent playing fields are major trip generators. On busy weekends in the winter, when both Rugby and Football clubs have matches for their junior and senior teams the car parking spaces currently at the old Penns Place council offices are filled to capacity. Inconsiderate parking can cause problems in Heathfield Road when parent take their children to play football. Since car parking currently occupies between one-fifth and one-quarter of the site and no multi-storey or undercroft parking will be allowed, it is hard to see where the cars of residents from 35 dwellings are going to be parked, let alone those of visiting players and supporters. We cannot find an estimate of the impact on local traffic among the supporting documents, suggesting that this has not been adequately considered.

We welcome the Policy Requirement for secure covered cycle parking and for giving priority to walking and cycling connection throughout the site, in Paragraph (f). Secure covered cycle parking will help to increase the uptake of cycling, especially since e-bikes are considerably more expensive than conventional cycles and they are more susceptible to damage from water ingress.

Encouraging site users to come on foot or by cycle requires much better-connected and adequately-surfaced shared paths and a better public transport service. The text in Paragraph (g) about the local PRoWs is useful in that these paths are well used for recreational walking during the drier months. However the main desire lines for everyday utility trips on foot and cycle have been overlooked. The desire lines in many urban areas have changed over the last 70 years[49] and PRoWs have become less popular for everyday travel. Those wishing to access the Penns Place Site use the Leisure Centre, playing fields etc on foot or cycle use the direct routes towards the main residential neighbourhoods to the west, the south and the north-west of the Site, but these routes need to be improved and made more accessible, if this site is to comply with Policy SD19.

The permissive shared footpath and cycleway from the Site across the southern edge of the playing fields to Brookwood Road[50] is a key route to the west towards the Town Centre.

The only walking and cycling route from the site to the south is along Penns Place Road to the Durford Road neighbourhood, but a recent audit by Hampshire County Council identified a need for numerous improvements along Durford Road.[51]

The development by Kebbell Homes on the Penns Field Site[52] will provide some paths running east-west thus improving sections of the informal footpaths linking Penns Place to the northerly part of Pulens Lane, as illustrated in Figure 3. These paths are well-used as they are on the desire line for many residents. However, improvements are needed to make these routes accessible to all.

The SDNPA's Development Brief for the Land at Pulens Lane Site (SD85) stipulates "a publicly accessible cycle and pedestrian route through the entirety of the site from Pulens Lane to the eastern boundary". This route could be extended across the public land controlled by Petersfield Town Council, but given that this site is a local nature reserve, any route should be sensitively positioned, with appropriate steps taken to protect plants and wildlife. This route would give the residents of Sheet all-weather off-road access to the sports and leisure facilities at the Penns Place Site.

[49] The National Parks and Access to the Countryside Act 1949 led to the creation of the "definitive map".

[50] Brookwood Road is a new road constructed by Kebbell Homes Ltd, which connects to Heathfield Road. This road provides access to the 85 dwellings under construction on the Penns Field Site, which is to the west of the playing fields which surround the Taro Leisure Centre.

[51] Hampshire CC, East Hampshire Local Cycling and Walking Infrastructure Plan, Consultation Draft, October 2024. See the audits of Walking Routes 3.7 and 3.8 and Route 220.

[52] Planning ref: SDNP/22/05410/CND etc.

The dwellings are offered for sale here: https://kebbell.co.uk/new-homes/hampshire/plot-4

The sites at Penns Place (EA067) and at Pulens Lane Site (SD85) should not be planned as if they are independent and only connected by the road network. This approach is bad for the health of Petersfield residents as it will fail to deliver routes for active travel, thus obliging people to use their cars. The barriers between the separate tiers of local government need to be broken down to deliver sites that contribute to the spatial jigsaw that is known as "urban development" in a coordinated manner.

Figure 3: looking east towards a tarmac path and houses recently constructed Kebbell Homes on their Penns Field Site. The land in the foreground is controlled by Petersfield Town Council. Photographed on 15th March 2025.

Pedestrians and cyclists travelling west towards the Town Centre face numerous problems once they reach Pulens Lane. Pulens Lane is heavily trafficked (in peak hours) narrow two way road with a single footway on the east side only.[53] Hampshire County Council is currently addressing some of the problems directly on Pulens Lane,[54] but the serious deficiencies remain of the key walking/cycling route along Tilmore Brook[55] and along Heath Road.[56]

Steps should be taken to ensure that the path planned across land belonging to Churcher's College (and part funded by a CIL grant)[57] is integrated with the planning of this Site.

The offsite improvements identified above are essential to reduce the vehicle trips to this site and to reduce parking congestion.[58] This will require both a significant contribution from the developer, as well as additional investment. Both are warranted in view of the very large number of trips generated by the Taro Leisure Centre and the playing fields, the cumulative impact of multiple developments on the eastern side of Petersfield, the inadequate road network and decades of under investment in infrastructure for active travel.

There is concern at Sport England about the impact of artificial grass pitches.[59] It has been estimated that infill material used in artificial sports pitches is one of the largest sources of intentionally-added synthetic polymer microparticles to the environment in Europe. Microplastic pollution threatens environmental and human

[53] Briefing Note, walking, Cycling and Other Issues at the Junction of Pulens Lane – Durford Road & Pulens Lane – Barnfield Road, 2021. This is available here:

https://www.easthants.gov.uk/east-hampshire-place-making-strategy/petersfield-place-making See "Petersfield junctions - Pulens Lane".

[54] See: https://www.hants.gov.uk/transport/transportschemes/petersfield-pulens-lane

[55] East Hampshire District Council, LCWIP Technical Report V1.2, 2020.

[56] Hampshire CC, East Hampshire Local Cycling and Walking Infrastructure Plan, Consultation Draft, October 2024. See the audit of Route 220.

[57] SDNPA, Infrastructure Business Plan, Appendices, December 2023.

[58] As well as causing difficulties in the vicinity of the Taro Leisure Centre and Penns Place, it has also led to complaints from residents of Heathfield Road because increasing numbers of cars ferrying children to sports activities are parking in Heathfield Road, where they block site lines and obstruct pavements.

[59] See the article under the heading "3G pitches, microplastics and rubber infill" at:

https://www.sportengland.org/blogs/boardman-lets-be-on-right-side-history

health.[60] A clause should be added to the Policy Requirements referring to the appropriate regulations and requiring management measures, in the event that artificial grass is to be used.

There are opportunities for tree planting trees along the pitch boundaries and boundaries of the site. In our ever-warming climate, the provision of shade for the spectators of sport will be valuable.

5.2 Land South of Paddock Way, Petersfield (EA071)

5.2.1 Our view of Development on This Site

This site is identified for a development of 100-150 C2 care home units or C3 flats. However we do not support development on this site in the manner described because of the inadequate access to the site for vehicles and for active travel. We recommend that a solution be found for improved access, including direct pedestrian and cycle access from the site to the north and east to access the Town Centre and Causeway and to the south. Access to the countryside to the west across the A3 would be beneficial to a large number of residents in the neighbourhood, including the new development of 54 homes by Thakeham.[61]

We note that there is potential for accessing services and public transport in the Town Centre without being dependant on a car, albeit only for those fit enough to make trips of 1.4 km in each direction on foot, or on a cycle/e-bike (this distance is nearly twice the distance that most people will walk to access services[62]). In view of this distance and the proposed C2/C3 class dwellings, close attention should be paid to cycle routes, as well as pedestrian routes, the developer should be required to operate, or fund, a permanent bus service from the Site to the Town Centre.

We recommend that the following needs of the elderly and disabled people be summarised under "key matters and policy requirements":

- 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).
- Shared surfaces where there are cycle movements commonly cause problems for those with hearing and visual impairments.
- 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.

The references listed in this footnote[63] include information on these matters.

We are of the view that significant investment in infrastructure is needed to make this site sustainable in transport terms. Developers will need to contribute but this is unlikely to be sufficient to fund the numerous improvements needed to footways, cycleways outside the Site and for a bus service.

5.2.2 Comments About Key Matters and Policy Requirements

5.2.2.1 Comments about Paragraph (c)

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.

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[60] OSPAR Commission, OSPAR Background Document on reducing microplastic contamination from performance infill in artificial grass pitches, 2024.

[61] Planning reference SDNP/23/03638/FUL.

[62] Sustrans, Walkable Neighbourhoods, 2022.

[63] Barton et al, Shaping neighbourhoods, Third Edition, Routledge (2021), Sections 3.15 and 3.16.

DFT, Inclusive Mobility, 2021.

DFT, Cycling Infrastructure Design, LTN 1/20, 2020.

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. As a result of rates of private car/van ownership normally seen in East Hampshire, inadequate off-street parking provision and a lack of public parking bays, many residents normally park with two wheels on the footway, see Figure 4 and Figure 5. This partially blocks the footway for pedestrians and the disabled, but makes space for HGVs including refuse lorries. Despite the pavement parking, shuttle (one-way) working is normal for vehicles travelling along Paddock Way.

190 trips daily trips were forecast for a similar but smaller development of 97 C2 units in Harrier Way, Petersfield.[64] A report commissioned by SDNPA estimated 712 vehicles trips during the AM and PM peaks.[65] The large discrepancy in these estimates is not understood. However this demonstrates that large complexes of C2 housing generate hundreds of vehicle trips a day. Tertiary streets[66] 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. An alternative access route should be investigated. A route through part of the Hampshire CC Depot to connect this site to Borough Road appears possible.

5.2.2.2 Comments about Paragraph d)

As mentioned in Section 5.1, the desire lines in many urban areas have changed over the last 70 years[67]. PRoW 189/44a/1 goes nowhere as it has been severed by the A3 (a 4 lane trunk road where vehicles travel at motorway speeds). This PRoW is impassable with fallen trees and debris well before the A3 is reached. However the short section that bypasses part of Paddock Way could be used as part of an informal footpath passing to the west of the Site, if enhanced. It is mainly used at present by dog walkers to make a circular walk.

Access to the countryside from PRoW 189/42/1 is also significantly curtailed by PRoW 189/43/1 and PRoW 189/41a/1, which have also been severed by the A3. This limits the amenity value of this part of the PRoW network. These severances by the A3 should be acknowledged and addressed. A footbridge over the A3 on PRoW 189/41a/1 would double the access to countryside to the west from this Site.

Paragraph (d) should be re-written and expanded to cover access for pedestrians, cyclists to local services, public transport and schools, including cycle access, rather than focusing exclusively on the historical local PRoW network. The opportunities include making Reed Way and Otter Walk accessible via a new shared path over a footbridge towards the south of the site, or mid-way, onto Otter Walk. This would both allow access to the countryside to the south without having to walk north beyond the boundary of the site and back again and offer access towards The Causeway, The Petersfield School and bus stops for Havant by walking north along Otter Walk and then using the link to Test Close to reach Orwell Road. A shared path would also allow cyclists to access the shared cycle way to Queen Elizabeth County Park.

Most of the single pavement on Borough Road, which forms part of the most direct route from this site to the Town Centre, is only 1.5 metre wide,[68] but with potential for widening.

5.2.2.3 Comments about Paragraph (g)

The existing access to ProW 189/42/1 is impassable in wet weather, the short section from Paddock Way to Reed Way is in urgent need of upgrading including the bridge over the watercourse. The entire site is heavy clay so footpaths and cycleways need to be constructed to shed water, with water being kept away from the paths, if they are to be used all year round. See Figure 4 to Figure 7 for photographs of the PRoWs near the Site.

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[64] Transport Statement by Peter Basham Associates submitted for Planning Application Ref SDNP/22/04472/FUL by McCarthy Stone in August 2023.

[65] See Table 4.2 of Royal Haskoning DHV, South Downs Transport Study, November 2024.

[66] See HCC's TG1 which describes the characteristics of primary, secondary and tertiary streets.

[67] The National Parks and Access to the Countryside Act 1949 led to the creation of the "definitive map".

[68] The minimum recommended width is 2.0 metres (source DFT's Manual for Streets, CIHT's Manual for Streets 2 etc, HCC's TG10).

Figure 4: looking north along Paddock Way photographed from the southern end. These 6 photographs were taken on 26/2/2025.

Figure 5: looking south along Paddock Way photographed from the vicinity of No 5A.

Figure 6: PRoW 189/44a/2 where it runs parallel with Nos 120-124 Borough Road. Brambles and mud render this route impassable for most journeys.

Figure 7: PROW 189/42/1 crosses a steam on a rotting bridge behind near No 6 Reed Way. Note the mud.

Figure 8: PROW 189/42/1 behind near No 6 Reed Way. Note the sandbags used to mitigate a flooding issue.

Figure 9: PROW 189/42/1. This PROW lacks views and informal surveillance. Waterproof shoes are needed. Many pedestrians are likely to prefer to use the adjacent and parallel pavement.

5.3 Land at the Festival Hall, Petersfield (EA225)

This site is identified for a development of 20 flats and commercial floor space. There is demand for flats in the centre of Town as evidenced by the popularity and demand for the flats in Fitzhamon House in Idsworth Down, adjacent to the Festival Hall site. A development comprising smaller, affordable flats would be appropriate in the proposed north-western area of the site. It should be placed so that the pool is not overlooked, nor the Festival Hall overshadowed.

However, given the number of unoccupied commercial premises in the Town Centre and the fact that commercial units in the Dolphin Court development in Dragon Street were not taken up but were converted to dwellings, it is unnecessary to provide any commercial floor space and the area would best be used for dwellings.

Paragraph e). We approve the provision of sustainable options and would hope that trees would be included in any planting schemes. The Car Park should have trees throughout and the boundary with Tor Way could be a hedge with small trees acting as a natural sound and pollution barrier and increasing biodiversity.

To encourage residents to cycle into Town the cycle parking should be secure and covered.[69] While consideration could be given to solar panels on the roof and batteries to run e-bike charging points, we would prioritise a structure that responds to the local built context, rather than an off-the-shelf prefabricated structure, because it is essential that this cycle parking should be in a prominent position with ample natural surveillance and in a well-lit position because of the prevalence of cycle theft.

More charging points for e-vehicles should be provided in the Car Park.

It is important that parking spaces are not lost. If spaces were to be lost, this would impact the swimming pool as many visitors come from the surrounding area and park outside the pool. It will also impact on the Festival Hall especially on days when there are day-long fairs or events or Saturday matinee performances. There could also be an impact on visitors to the Town as this is one of the only car-parks where it is possible to park all day. It is also the closest car-park to the Heath and the lake, which are major Summer attractions.

Paragraph f). The provision of safe routes for cyclists and pedestrians throughout the site is important as is the connection between Tor Way and Heath Road and the upgrading of the junction with Tor Way for the shared footpath & cycleway.

The gradient of the ramp should be reduced and the route improved from the Car Park through to the signal controlled pedestrian crossing of the B2070, which leads pedestrians towards Folly Market and the rear of Waitrose and Rams Walk. There is potential to re-route this path through the green space to the pedestrian crossing, offering an enhanced sense of arrival[70] (subject to potential land ownership matters).

Paragraph g). The loss of No 16 Heath Road will make the Men's Shed homeless. This is a thriving charity which has grown steadily in numbers and fills a particular need in Petersfield. They provide an important social service and through repairing and upcycling items, are an important part of sustainable life in Petersfield. Provision of a new site for them would be important.

Paragraph h). Mature trees on the NW boundary must be retained and also those near the Festival Hall. The i-tree survey[71] showed that Petersfield had a very low percentage of tree cover. We cannot afford to lose any more large trees.

The End

[69] The SDNPA's Guidance on Parking for Residential and Non-Residential Development, Supplementary Planning Document (April 2021), provides guidance on the appropriate capacity of cycle parking needed at sui generis (unique) establishments including concert halls. If a capacity of 500 people is assumed for the Festival Hall, with 12 staff on duty, then this document suggests that cycle parking is needed for 20 conventional cycles, with additional capacity for oversized bikes. Currently capacity is provided for only 3 cycles on stands which are insecure, see Figure 19 in the Appendix of this document: Cycle Parking Survey and Count in Petersfield, 2023, which is available on the PeCAN website under "Resources".

[70] As recommended by Hampshire CC in their Technical transport study for Petersfield Town, On behalf of Petersfield Town Council, 2018, Document reference: HF17241514.

[71] The Petersfield Society, Petersfield's Trees, their importance and value, Results of the i-Tree Eco Survey, 2017.