

# New Forest Association PLANNING COMMITTEE

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Reply to: -

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Sent as attachment to Email only to [localplan2016@nfdc.gov.uk](mailto:localplan2016@nfdc.gov.uk)

12 September 2016

Policy and Plans Team,  
New Forest District Council,  
Appletree Court,  
Beaulieu Road,  
Lyndhurst,  
Hampshire SO43 7PA.

Dear Team,

## **Local Plan Review 2016-2036 Part One: Planning Strategy Initial Proposals public consultation**

1. New Forest Association (NFA) is dedicated to protecting and sustaining the unique character of the New Forest. Our members promoted the 1877 New Forest Act to secure the future of the New Forest and now we are the voice for the New Forest National Park - its friend and watchdog. We are an independent, campaigning charity based on its membership and volunteers. Further details may be found at [newforestassociation.org](http://newforestassociation.org)

2. NFA appreciates NFDC's difficulties and recognises that the greater district owns, loves and protects the land of the new National Park. NFA believes the continuing health of Solent, Crown lands and South Hants AONB is the primary factor in ensuring the continuing financial wellbeing of the District and to a large extent South Hants and Bournemouth/Poole Built Up Areas (BUAs). NFA welcomes the degree of joint working between NFDC and NFNPA on each others' local plans and seeks outcomes that are beneficial to the greater District.

3. New research by Campaign for Protection of Rural England has found that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable across the country.<sup>1</sup> The position of New Forest District, wedged between the South Hampshire BUA and the Bournemouth/Poole BUA, has amplified the deficiencies of the SHMA in providing the base line for this strategy. Given its geographical position, its weird shape and high proportion of protected land, NFA contends that *New Forest District outside the New Forest National Park* is in a near unique position to secure from DEFRA a relaxation or an understanding that neighbouring conurbations should be obliged to take a large proportion of the dwellings figure. The local population expects this challenge to have been made before other avenues are pursued.

4. The population and economic assumptions used in the SHMA were made prior to the Brexit vote, are no longer valid and will be updated later this year. This could reduce demand by a fifth (document S7) which is not the insignificant figure the consultation paper suggests and could change the shape of the plan. NFA ask the Authority to tread softly until new figures are released. As CPRE point out, once a pool of land with permission in excess of demand or realistic build rate exists, then the role of the LPA is usurped by house builders, and profitability rather than need determines where and what houses are built.

NFA will separately pursue these matters nationally.

5. NFDC is custodian of Hampshire's only Green Belt. The boundaries of this Green Belt are well defined and that they have for some decades dictated local planning policy in those parts of the District (NPPF 83,84).

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<sup>1</sup>The report summary, *Set up to fail* is available at: Summary at <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/download/4307> The full report is available at: [Smarter SHMAs: A Review of Objectively Assessed Need in England](#)

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NPPF states, as a preliminary to details on Green Belts: -

79 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to *prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

The emphasis on permanence in 79 is to be noted. Without permanence Green Belts cease to exist, they simply become agricultural land to be built on when it is inconvenient or less profitable to build elsewhere. While later paragraphs in NPPF recognise the need for some boundary flexibility in exceptional circumstances NFA contends NPPF requires demonstration of exceptional circumstances for each intrusion. NFDC are misusing the list of purposes in 80 to redefine the Green Belt within the district; an approach that is contrary to the NPPF in that the fundamental aim stated in 79 is thrown away. Further there is no sense at all in having embarked upon NPPF 80 redefinition to then list for exclusion from the Green Belt sites that meet the criteria. The report states that land of sites D,F,G,J,K,M, N,P, either strongly or relatively strongly meet Green Belt purposes and only one site O is assessed as only weakly meeting the purposes.

It is not satisfactory simply to quote NFDC's own contractors to justify this approach (document 5.30). "A *common interpretation of the [national planning] policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations [for development]*". It is not quotation marks that give a statement credence but reference to instances of the approach being adopted and successfully tested at examination. Where are they?

6. Section 11A of the National Parks and Access to the Countryside Act 1949 (as inserted by section 62 of the Environment Act 1995) places a duty on NFDC when exercising or performing any function in relation, or so to affect, land in the National Park to have regard to the statutory purposes of National Park designation. These are to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park and promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

NFA believes the proposals will have an unacceptable detrimental effect on the National Park unless the provision of infrastructure to deal with increased population is properly considered.

The most serious and problematical is the District's transport infrastructure. Even at the time of the Dibden Bay enquiry, it was recognised that the A326, which borders the National Park was at capacity from Dibden Purlieu northwards and the problems with the Brockenhurst level crossing and the junction of the A35 and A337 at Lyndhurst having national notoriety. Within a National Park and on protected land, it is difficult to see how these and other bottlenecks on the fenced roads can be eased. Thus more frustrated drivers will choose to take alternative unfenced routes across the open Forest making the management of depastured stock more hazardous, damaging protected verges and lessening the tranquillity and wilderness aspects of the Park in clear contravention of its purposes. A combination of generous alternative recreation facilities (eg SANGS) and traffic calming on the unfenced roads of the Park can overcome the problem, but some proposed sites (D E F G for example) should be delayed until it a solution is clearly demonstrated.

NFA does not consider it acceptable that the Community Facilities for NFDC spill onto the National Park. It will be tempting for developers to locate Suitable Accessible Natural Greenspace (SANGS) within the National Park as land use restrictions make this a cheap option, however the overall affect would be to encourage greater recreational use and diminish undisturbed areas at a time when evidence is emerging that disturbance has significantly reduced the habitat value of the Park over the last 10 years. NFA also have a concern that developers may seek this cheap option in the provision of built or urban-like facilities within the Park for housing beyond the Park. Examples are the provision of playing fields as open space and the expansion of educational facilities.

7. The consultation document presents an aging population. It is too easy to use age as a short hand for employment and infirmity leading to false assumptions regarding dwelling type and location. The Government recognises this not be the case with the abandonment of the default retirement age and movement of the start of state pension. (Will it be 70 by 2036?) Other evidence suggests vitality is being maintained longer; for instance the over 65 population of care homes remained stable between 2001 and 2011 despite an 11% growth in this population group in that period<sup>2</sup>, and a recent report from *Retirement Homesearch* shows that over half are waiting beyond 70 and a quarter beyond 80 to downsize (the step before moving to supervised flats).

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<sup>2</sup> *Changes in the Older Resident Care Home Population between 2001 and 2011* Office of National Statistics

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8. Another factor affecting housing density and thus land requirement is house size, and the Authority may have noted that the small sites affordable housing contributions policy (November 2014) suggested a standard dwelling was 100 square metres .....*introduced a national threshold of ten units or fewer (and a maximum combined gross floor space of no more than 1,000 square metres).*

9. NFA does not seek at this stage to contest or confirm NFDC's "Independent" study into Hampshire's Green Belt. It is assumed that Dibden Bay reclaim is not being considered as an *other potential opportunity area* because it is an SSSI and not because it is being reserved for possible future expansion of Southampton port. The past documentation and decisions regarding this area are a useful touchstone for the other potential areas on Southampton Water.

10. There is an assumption at document reference 3.16 that exhausted sand and gravel workings are exclusively suitable for development. This is not so as some have a particularly high potential as *Nature Improvement Areas* (NIAs) and their future use should be assessed in the same way as other Greenfield sites.

11. In addition to section 62 duties, NFDC has a duty not to damage Natura 2000 sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) of the District. The protection of such areas varies across England and NFA finds it unacceptable that the protection afforded the various New Forest areas is less than that afforded the Thames Basin SPA and Dorset Heath SPA. There is no logic in the varying interpretations made of Natural England's guidance<sup>3</sup> and NFA will campaign that no development takes place within 400M of the Areas. This affects the capacity of proposed sites B, U, and V.

12. NFA considers the contribution of 800 (40 per annum) from very small sites is an underestimate. The introduction of brownfield site register, the inclusion of dwellings created by LDCs, the classification of holiday homes as dwellings (Appeal APP/B9506/W/ 16/3143523), overly conservative past estimates, the probability of very high density services flats and most of all the unending enterprise of local small developers suggest a figure of 1600 (80pa) is more realistic.

The preferred view of NFA is that special circumstances warrant NFDC presenting a local plan that falls significantly short of its *Objectively Assessed Housing Need*. (Assuming the neighbouring conurbations will not accommodate the difference).

The following paragraphs are included if the Authority fails in pursuit of this policy and is compelled to built on Hampshire's Green Belt. In which case NFDC should seek to fulfil document reference S23 and demonstrate that growth benefits not just people but the District's environment on which its prosperity over generations depends.

13. The essence of the Government's land use policy is that all areas must work harder - not just for development but for recreation, (10% more visitors for National Parks), and for biodiversity where the Government's Natural Environment White Paper introduced NIAs *to enhance and reconnect nature on a significant scale* in England. NFA is analysing the land all around the National Park for pockets of high existing habitat value and opportunities for improvement to meet the Government's stated aim for nature improvement as well as additional recreational space.

Members of New Forest Association have a detailed knowledge of the District stemming back to the creation of the Heritage Area and would wish to be consulted on and contribute to the Authority's Mitigation Strategy (document reference 1.18).

14. NPPF continues: -

*81 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*

Within Hampshire's well defined Green Belt little effort seems to have been made to implement this paragraph of NPPF. The current review offers an opportunity to do this and NFA urge that land is designated for the range of purposes stated leading to a coherent network of SANGS and NIAs. Common sense dictates that this should be done at the same time as land is designated for development. When a land owner of green field or Green Belt is

<sup>3</sup>

[https://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Planning\\_policy/Interim\\_Avoidance\\_Strategy\\_for\\_TBHSPA%20-%20November\\_2010.pdf](https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Interim_Avoidance_Strategy_for_TBHSPA%20-%20November_2010.pdf)

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seeking a development gain circa £1,000,000 per acre then he will be amenable to surrendering other land for the purposes defined in 81. Once his land has been designated, his generosity will be tempered.

15. The review covers the next 20 years. NFA considers that it is the provision of SANGS/NIAs that will determine its success or otherwise. Given the constraints and geography of the District an approach that firstly defines a boldly provided network of SANGS/NIAs and then fits into that framework the proposal sites would make the proposals far more acceptable to the local populace, protect the National Park and its commoning tradition and reduce road traffic problems. NFA contends that time exists to produce a detailed green infrastructure strategy for the district in parallel with the Review. New Forest Association continues to explore the evidence and will appreciate an opportunity to discuss our findings with NFDC before the year end.

Yours sincerely,



Graham Baker, NFA Planning Committee

From NFDC Consultation Document

## Appendix A: Proposed strategic sites Maps of proposed strategic housing sites

Totton and the Waterside sub area	About 2,050 homes
A. North of Totton	About 990 homes About 5 hectares employment
B. West of Marchwood	About 880 homes
C. North of Marchwood	About 180 homes
South Coastal Towns sub area	About 2,960 homes
D. North of Lymington (Green Belt)	About 870 homes
E. South West of Lymington (Green Belt)	About 240 homes
F. North of Milford on Sea (Green Belt)	About 270 homes
G. North East of Everton (Green Belt)	About 120 homes
H. Central Hordle (Green Belt)	About 180 homes
I. North of Hordle (Green Belt)	About 150 homes
J. North East of Hordle (Green Belt)	About 200 homes
K. North West New Milton (Green Belt)	About 300 homes
L. North East of New Milton (Green Belt)	About 130 homes
M. South East of New Milton (Green Belt)	About 200 homes
N. South West New Milton (Green Belt)	About 300 homes
Avon Valley and Downlands sub area	About 1,880 homes
O. West of Bransgore (Green Belt)	About 120 homes
P. South of Ringwood (Green Belt)	About 750 homes
Q. East of Ringwood	About 400 homes About 5 hectares employment
R. North of Ringwood	About 130 homes
S. North West of Fordingbridge	About 380 homes
T. East of Ashford	About 100 homes

## Maps of other potential opportunity areas

- U. The former Fawley Power Station (mixed use)
- V. Eling Wharf (mixed use)
- W. Otter Nurseries (parkland business campus)
- X. Stem Lane (employment)