



PLANNING and TRANSPORT COMMITTEE

Reply to: -

Brookley Farmhouse Sway Road Brockenhurst Hampshire SO427RX
01590 623935 planning@friendsofthenewforest.org

Sent as attachment to Email only to localplan2016@nfdc.gov.uk

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

12 August 2018

Dear Team,

**Local Plan Review 2016-2036 Part One: Planning Strategy SUBMISSION DOCUMENT FOR
REGULATION 19 PUBLIC CONSULTATION
New Forest District outside the New Forest National Park
Response of New Forest Association**

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 NFA now markets itself as *Friends of the New Forest*.

2. NFA do not apologise for this generalised response. In the two years since consultation on the initial proposals, fundamental changes have occurred in the Authority's policy with little consultation and explanation. Its attitude to the West Hampshire Green Belt, its dismissal of the original objectively assessed housing need method and result, its attitude to the redevelopment of the Fawley Power Station site are examples.

3. Chapter 2 accurately profiles the District outside the National Park. There is a shortage of unprotected real estate and what there is, almost by definition, is adjacent to protected land. It is the contention of NFA that the plan is unsound in that the decision made to seek to accommodate the entire objectively assessed housing need involves unacceptable consequences to the environment of the District outside the National Park and that of the neighbouring New Forest National Park. Latitude is available from NPPF in the circumstances that exist in the District outside the National Park. The description of District outside the National Park, wedged between a National Park and the sea, is mirrored in the location of Brighton and Hove City Council. In Brighton's local plan a higher value was placed on environment, and a lower one on meeting assessed housing need; an approach that was accepted on examination.

While the Authority has in place mitigation measures associated with the protected areas of the National Park, the Plan is unsound in that the effect on the National Park as a whole, (Section 62 duty), of such extensive development close to the boundary is not compensated or mitigated.

The District including the National Park lies between the Bournemouth and Poole built up area, the UK's sixteenth largest, and South Hampshire built up area, the UK's seventh largest. It has a regional role in providing recreational opportunities, landscape alternative and relative tranquillity. NFA contends that

insufficient effort has been made by the Authority to persuade these conurbations that the District's regional value is best served limiting development, and by requiring these conurbations to accept a share of NFDC's objectively assessed housing need. The plan is considered unsound in this respect.

In allocating development sites, the Authority has failed to recognise that the District has become progressively more urban and that central locations in many of the small towns could be redeveloped to accept far higher densities than at present. A number of suitable sites are owned by the Authority.

See also comments on Fawley and Dibden below.

4. NFDC is custodian of Hampshire's only Green Belt. The boundaries of this Green Belt are well defined and they have for some decades dictated local planning policy in those parts of the District.

The relevant documents are the National Planning Policy Framework of 2012 and the National Planning Policy Framework Draft text for consultation March 2018. NFA contends that the plan is unsound in that it has failed to demonstrate that it has met the criteria for disturbing the Green Belt contained in either of these documents. Some areas of failure are indicated in 4. Additionally the NPPF requires that accompanying the Authority's redefinition of the Green Belt should be a 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;* (NPPF 81). Such an ambition would be practical in that land proposed for development and other land in the Green Belt is in the same ownership. An ambitious plan such as Test Valley's Forest Park could do much to remedy Section 62 failings mentioned above.

5. The development of a small town at Fawley is opposed by the NFA, most especially as it requires a *major development* within the National Park comprising a school, SANGS, extensive housing and the as yet undefined *other public open space* which is assumed to include football pitches and tennis courts. Notwithstanding NFA's opposition to this development, the Authority has failed to adequately demonstrate why the allocation for the site should be effectively limited to 1380. The Authority's supporting documents show that a higher number would make the development more profitable and thus relieve the burden currently falling on the National Park. Further, the latest public statement (July 18) from *Fawley Waterside* following release of a plan in which the chimney was demolished - *We recognise that the chimney is an important and popular landmark used by sailors and those walking the New Forest to orientate themselves. Following our public exhibitions last September, a huge 72 per cent of people said they wished to see the chimney retained. We are therefore continuing to consider a variety of detailed designs that will include a full evaluation of the current structure. If the chimney is to be removed it will be replaced by a building of sufficient scale and height that can be seen from the Solent's eastern and western approaches.* - suggests that landscape considerations have changed as any such building would need to be taller than the existing power station. NFA's recent landscape survey of the area is attached.

The phrase in the policy *Around 1,380 new homes dependent on the form, size and mix of housing provided,* needs to be reconsidered as it is an invitation to the developer to amend his plans to suit his profit margin rather than the needs of the community.

6. NFA does not accept Associated British Ports' assertion that *Dibden Bay is the only area of land physically capable of accommodating a significant expansion of the Port of Southampton.* Their need is inadequately defined, (deep water berths or back up land), and is not supported by the most recent trends in world container traffic. Other land exists, such as Marchwood Military Port and the land at Eling recently, (and, at least to NFDC, surprisingly), acquired by ABP. NFA contends it cannot be demonstrated that all this land would be required for port operations in the next 17 years, it should not have been reserved and should have been considered for mixed development. While NFA may in event oppose any development on this land, the Authority's omission to consider this land for other purposes renders the plan unsound.

Yours sincerely,



Graham Baker, NFA Planning Committee

Registered Charity 260328