



PLANNING and TRANSPORT COMMITTEE

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8 July 2017

Sent as attachment to Email only

David Illsely
Policy Team
New Forest National Park Authority
Lymington Town Hall
Avenue Road
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Dear David,

**New Forest National Park Local Plan Review
Potential Alternative Housing Sites - Consultation Period to 26 July 2017**

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 NFA is the voice for the New Forest National Park - its friend and watchdog. An independent, campaigning charity based on its membership and volunteers. Further details are available at newforestassociation.org

2. NFA's response to previous consultations on the Local Plan Review

NFA view remains consistent with its responses to earlier consultations seeking:

- a presumption against development within 400m of New Forest SPA, (26 Nov 2016.....*there must be a presumption against development in that zone. NFA accepts that no development within 400m will throw up anomalies within the defined villages and for exception properties for land-based workers. Given the presumption against, NFA looks forward to discussing what measures might allow individual developments to be allowed*)

- that sites should be sought within the existing designated village boundaries (26 Nov 2016.....*all greenfield sites in the National Park are precious, and their use for development will involve the loss of back up grazing or potential [back up grazing] and we all should share in an ambition not use such sites in what is the country's smallest and most heavily designated National Park. NFA considers all publicly-owned land in the villages a potential development site, albeit there may be a need to canvas for release, to redevelop low density existing dwellings, and to use innovative design to e.g. construct over the edge of car parks*)

and (19 February 2016.....*the purpose of this note is primarily to draw attention to areas that have the potential for development to meet this need and may have been overlooked elsewhere. With associated maps*)

- that the Authority should adopt a policy of affordable housing only (19 February 2016 - *that the only NEED for new dwellings is for local people unable to afford market housing prices*) and (26 Nov 2016 - *NFA would actually favour a policy of affordable homes only*).

- **Policy 20 Ashurst** (26 Nov 2016 *Allocated site at Ashurst is opposed; see appendix 3. The gap between the Village and the South Hampshire built up area is 320 metres at its narrowest point. This area is under speculation pressure, it is close to two NFDC proposal sites and risks being the choice of a SANGS. It is bordered by the A326 which will come under intense pressure from the Dibden Bay development and the planned new town at Fawley, and it has recently been subject to a failed application for housing (refused mainly on percentage of affordable). NFA contend that any development north of the Village weakens the ability to resist further pressure and would quickly lead to the loss of the gap. The integrity of the National Park would be compromised with the country's seventh biggest built up area thrusting a spear towards it heart*).

3. Policy 23: Land South of Church Lane, Sway

It is understood that this potential site is now only a third its original size, the part less than 400m from the NFSPA being removed. The remaining land was, however, a part of the Bournemouth Greenbelt prior to it receiving increased protection by becoming a part of the New Forest National Park. NFA believes that consideration of this back up grazing land in a vulnerable corner of the National Park should additionally be subject to government advice on Greenbelt development contained in the recent housing white paper.

Were the reduced site to become available as an affordable housing rural exception site, it would be supported by NFA. The issue will, therefore, be the proportion of benefit to the community compared with that to the developer.

Presumably the suggested mitigation for this site - the return of the memorial football ground to heathland - remains.

4. Policy 22. Land at Lyndhurst Park Hotel

It is understood that a new planning application for this site may be expected. Natural England's new advice affects the greenfield element of this site, and the reasons behind the ruling may affect the nature of any development permitted. NFA urges the Authority to act on NFA's early comments on the needs of an aging population - (26 Nov 2016 *Without further investigation, the support for new specialist accommodation for older people could act contrary to the overarching policy to provide dwellings for local people. Such a policy is self fulfilling, it generalises a wide range of accommodation types that in fact vary from Mr Tarling's "finisher homes" through serviced flats to care homes to secure nursing homes, and applies broad age statistics to a single village at a point in time.*

Before such a policy can be justified, statistics need to be produced on the ratio of National Park population to existing specialist accommodation in various categories, a more detailed breakdown of the anticipated age profile of the over 64s, and the local connection of recent purchasers of specialist accommodation in the National Park).

5. Land at Ashurst Hospital

In principle, NFA supports redevelopment of this site believing arrangements can be made to make a journey (for humans) to the neighbouring SPA over 400m. However, damage to the SPA by domestic pets will need to be assessed and mitigation measures that give net benefit the NFSPA as a whole would need to be agreed.

NB There are suggestions that when this land was released for development, conditions were applied, maybe by Court of Verderers, regarding its use if no longer required by NHS. Further information will be forwarded as it becomes available.

6. Land at Uncle Tom's Cabin

It is noted that this land was not proposed in the previous consultation - presumably because it was not considered suitable. The site entrance is 1.3 km from the local school, reasonably near shops etc and on a bus route. There are, as is noted, problems of neighbours and trees and of course there will be loss of traditional back up land.

Were the site to become available as an affordable housing rural exception site, it would be supported by NFA. The issue will, therefore, be the proportion of benefit to the community compared with that to the developer.

7. Land at Fawley

This land is promoted for residential development *to support comprehensive regeneration of the power station*. NFA is opposed to this site. NFA believes that several recent large developments in areas with similar houseprice/earnings ratio demonstrate that, although requiring high initial capital, developments of former industrial sites such as Fawley are not only viable but very profitable.

There are special reasons why the National Park might sacrifice valuable back up grazing land to supply a primary school for the project. There may even be special reasons why land for other community facilities might be supplied. The SANGS to be provided for the Island site is to be within the National Park and, as it is currently proposed, will be supported by NFA.

NFA opposes the sacrifice of a SINC and back up grazing land for the provision of 150 luxury homes that will be built in advance of the power station site's development, and thus infrastructure. This will breach the proposed new 100 sq m rule, is not intended for the National Park community and will not contain an element of affordable housing. NFA will seek support for this opposition from other local and national bodies.

8. Calshot Village

It is noted that this land was not proposed in the previous consultation - presumably because it was not considered suitable. The proposal at this time is not supported and the Authority's reasons for proposing the site are not understood.

Ill-conceived efforts to social engineer this happy go lucky hamlet occur every decade or so, are roundly opposed by the local community and quietly shelved. This proposal is based on a non-existent school in an unknown location, non-existent transport links, and non-existent shopping and other facilities. It is not clear what a "better balance of housing of tenures" means as the hamlet currently contains more than its share of publicly owned housing and more than its share of small and, by local standard reasonably priced, homes. Will proposed houses not fit this pattern?

NFA does not accept that the odd unemployed and less than well behaved resident equals "social deprivation"; Calshot is much improved over the last 15 years and continues to improve.

Were the site to become available as an affordable housing rural exception site, it would not be supported by NFA. It lacks community facilities and residents would be obliged to provide their own transport. NFA would also need persuading that there is sufficient demand for affordable housing at this location from applicants with a connection to Calshot village. When a town of 5000 inhabitants exists at the Power Station site, the Calshot village site could be reconsidered.

9. Conclusions

NFA believes that more than anything, this current consultation has demonstrated that given National Park purposes, protected areas, exclusion zones, strategic gaps, shortage of back up grazing, and sustainability tests there simply is insufficient space for 700 homes over the next twenty years. The SHMA discussion with NFDC should be reopened and the approach adopted by the emerging Peak District National Park Development Management Policies... *has led to agreed reasonable estimates for housing delivery in the National Park based on past trends. Estimates do not represent a target but neither do they represent a limit.*

(http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0009/828297/Chapter-6-Housing.pdf). As indicated above, NFA is willing to help in ensuring a minimum of 400 new dwellings come from the villages.

There are 25,000 dwellings being built on our doorstep and hundreds of thousands more within easy reach. It should be recognised regionally that our focus should be coping with the demands of these new residents rather than fussing with 300 dwellings within the National Park..

Yours sincerely,



Graham Baker, NFA Planning Committee Registered Charity 260328