



New Forest District Council Local Plan

Ref:

(For official use only)

## Strategic Sites Masterplanning SPD Supplementary Planning Documents Representation Form

New Forest District Council has prepared a draft Supplementary Planning Document (SPD) on the above topic to provide further details on certain policies contained within the New Forest district (outside of the National Park) Local Plan 2016-2036 Part 1 Planning Strategy – Pre-Submission Draft

These documents are available for public consultation from 7 July 2018 to 30 September 2018. All comments made should be restricted to the content of the draft SPD.

**Do not use this form to make representations on the Pre-submission draft Local Plan.**

Further copies of the form can be obtained from the Planning Policy Team, downloaded from the Council's website or you can photocopy this form.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

First Name

Last Name

Job Title

Organisation

(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

(where an email address is given, this will be used as the primary means of contact)

Signature:

*Bruce Tindall*

Date:

#### Would you like to hear from us in the future?

I would like to be added to the database to receive updates on the Local Plan

Please do not contact me again

# Strategic Sites Masterplanning SPD

## Supplementary Planning Documents Representation Form

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### Sharing your personal details

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment.

### PART B: Your Comments

Please set out your comments below using additional sheets as necessary. Your comments should be set out in full – this will help the Authority to understand the issues you raise.

Please return completed forms to [spd2018@nfdc.gov.uk](mailto:spd2018@nfdc.gov.uk) by midnight on the 30 September 2018.

Where possible please refer to paragraph numbers at the start of each comment and restrict comments to the relevant chapter

For site specific comments, please refer to the site by number and site name. Each site starts with a copy of the policy from the draft local plan. If your comments relate specifically to this, please ensure that you also make those comments clearly via the **local plan consultation process** as no alterations to these parts of the document can be made within this supplementary document if they are not already to be made within the local plan policies.

*(Continue on separate page /expand (or add) box if necessary)*

Chapter / Para No. / Site Policy or Name	Comment
Chapters 1 – 6 and Chapter 7 – SS6 and SS5 including text relating to SS6 incorrectly included under SS5	<p>The Masterplanning SPD states that it builds on the policy and Concept Master Plan attached to Policy SS6 in the submission draft Local Plan. It provides three frameworks on landscape, built development and movement for each site. In respect of Strategic Site 6 there are multiple inconsistencies between the two documents and between and within the frameworks themselves.</p> <p>The base plan for all three frameworks and the SS6 Concept Master Plan is out of date and does not show three dwellings, one an agricultural workers dwelling south of Northfield Nursery within the New Forest National Park and two others constructed in the rear garden on Amberwood on the northern boundary.</p> <p>The Masterplanning SPD refers (in the section incorrectly placed under Strategic Site 5) to the character of the rural lanes but is silent about the visibility and safety of the access onto Ridgeway Lane. In terms of access, the main access to Ridgeway Lane through the National Park is simply identified in the SPD as a ‘suburban road with pavements on both sides’ in conflict with the reference three paragraphs above that ‘Primary access points need pavement on their north side’. Aside from the obvious landscape damage to the National Park, this suburban road will link into Ridgeway Lane, a rural lane with no footpaths. The second bullet point of the missing text (in SS5) states that there is ‘potential for a vehicular link’ which conflicts with the SS6 Master Planning Objectives at e. which states ‘it is intended that the two sides link’ and this is clearly shown on the movement framework. If as stated ‘it is not the main thoroughfare’, it is entirely unclear as to where the ‘main thoroughfare’ is.</p> <p>The SPD is also silent on both the two main pedestrian accesses identified in</p>

the supporting text on page 117 of the deposit draft plan (but not shown on the Concept Master Plan), namely the footpath link through amenity land for Forest Gate Gardens and the access via Woodside Lane which is remote from the site on the far side of Woodside Park. Does this mean both these proposals have been dropped? A further footpath link, which is shown on the deposit draft Concept Masterplan but not referred to anywhere in the policy or supporting text, is shown on the SPD movement framework as a link through to Ridgeway Lane with no onward provision from this point in the same way that pedestrian and cyclists will be disgorged onto Ridgeway Lane to the south and in two locations onto Lower Pennington Lane via the western access points.

Policy SS6 iii b requires Development and access arrangements to ‘respect the tranquility, privacy and security of the Oakhaven hospice.’ The proposals in the SPD are wholly inadequate - a ‘deep hedgerow and tree line (Landscape point 4) of unspecified depth which could be removed at will if provided within a residential curtilage would do nothing to mitigate the harmful impacts of noise, disturbance and overlooking to the hospice.

In terms of landscape, Policy SS6 and Concept Master Plan shows no protection for the landmark pine group adjacent to Lower Pennington Lane. Policy SS6 ii c. and the Concept Master Plan identify only two small areas of hedgerow with trees as ‘important tree belts, hedgerows and incidental open spaces around the site boundaries as landscape features.’ In fact the Concept Master Plan fails to show one of the existing rights of way across the site and it does not include any incidental open spaces around the site boundaries. Further, it gives no explanation as to why the two areas that are shown have been chosen over multiple other similar areas across the site or why they are considered to be of greater importance than the pine group on Lower Pennington Lane which is highlighted in the Council’s own adopted Local Distinctiveness SPD as a landmark feature. The landscape framework of the SPD, which would have only the weight of guidance rather than policy, shows a greater level of protection including the landmark pines, shown in this framework with the verge and bank retained and supplemented with a reference to unspecified ‘management’. This conflicts with the built development framework which shows back gardens extending right up to Lower Pennington Lane supposedly deep enough to retain trees but with a new hedgerow and verge as a green margin to the lane which could only be achieved by clear felling of these majestic pines and consequential devastating effect and urbanisation of the character of the lane. Given the elevation of the bank and scale of these trees, the only way they could be retained would be as a landscape buffer outside of residential curtilages. The failure of the SPD to recognize this demonstrates the Council’s disregard for this important landscape feature and its own adopted Local Distinctiveness SPD.

Apart from those which would require removal for construction of the link road through the National Park, the SPD inexplicably proposes the retention of the remains of the wind-blown rows of closely planted, dense, alien Leyland Cypress trees which were planted on and close to the line of the National Park boundary circa 1990 and the District Council consider this would constitute ‘good landscape design’ (Creating a Distinctive Character – bullet point 3 incorrectly placed under SS5) and (Item 3 Landscape Framework) instead of an appropriately designed native mix of landscape planting.

	<p>In terms of urban form and rural edge character, the document is vague and imprecise. Unlike on SS5 where development numbers are included for each parcel, with indications of development densities for some the SPD is silent on these matters for SS6 so it is left to guesswork as to what ‘low density’ and ‘density, scale and character drawn from ...the suburban edge of Pennington/Lymington’ actually means. This is in the context of the proposed SS6 allocation being <u>for a minimum</u> of 100 dwellings. There is no indication as to how high the ‘flatted development’ would be (Item 9 Built Development) or explanation as to how the conflict between that and the requirement for lower rise and lower densities close to the settlement edge (Item 1 Built development) for precisely the same location would be resolved.</p> <p>Unlike the frameworks for SS5 which provide a margin of open space on the southern boundary adjacent to countryside not within the New Forest National Park, both the Concept Master Plan and the frameworks for SS6 bring built development right up to and into the National Park, both where the suburban estate road cuts through the National Park but also at the southern edge of the two development areas to east and west of the link road allowing domestic curtilage and buildings to come right up to but not quite physically abut the National Park boundary.</p> <p>-The existing agricultural workers dwelling (omitted from all the plans) located immediately to the south of the proposed link road is visually very prominent across a wide area. At present it sits as an isolated dwelling within countryside on the northern edge of the National Park but post-development it would be viewed as the southern extent of a block of urban development in two wedges spreading south from the dense urban development hard up against the existing soft edge of the settlement. The development will comprise urban sprawl, spreading out beyond the rural edge of the settlement and urbanising an area which, as identified in the section (under SS5), ‘Creating a Distinctive Character’ has a ‘sense of being in the countryside’. That sense will be permanently destroyed by the proposed development and the aspiration to create ‘distinctive character’ through providing a contrived wedge of central open space, would do nothing to mitigate from that harm.</p>

Do you have any further general comments to make on the document?

PALLS aim is to protect and enhance the tranquility, rural environment and special character of the Lanes and their surrounding area. PALLS is a formally constituted society with 715 members and its aims are set out below.

‘The aims of the Group shall be to protect and enhance the tranquility, rural environment and special character of the Lanes and their environs by;

Resisting inappropriate development;

Protecting the green character of this area from urbanisation so it can continue to be enjoyed by residents and visitors alike.

Maintaining the tranquility and environmental quality of this sensitive area including land within the Green Belt and within and adjacent to the New Forest National Park.'

PALLS representations to the Regulation 19 consultation on the deposit draft plan has clearly identified the reasons why Strategic Site 6 should not be included as a strategic housing allocation and they will not be repeated here. This statement is a response to the Strategic Sites Masterplanning SPD and the Mitigation for Recreational Impacts SPD in so far as they relate to matters within PALLS terms of reference.

The Council have failed to follow their own Statement of Community Involvement in relation to this consultation specifically a failure to consult in accordance with Table 2, bullet point 3 which states the Council will,

'Give details of the consultation and how to comment in a news release and on the Council's web-site'

There has been no press coverage of the consultation on the SPD's and in order to find it on the Council's website you have to navigate into the section on Supplementary Planning Documents. There has been no effort on the part of the District Council to disseminate the consultation on the SPD's to the wider community and there has been no attempt to notify the adjacent landowners as there was for the Regulation 19 consultation on the deposit draft plan. The Strategic Sites Masterplanning SPD has significant drafting errors and it is clear (and recently confirmed by Lymington and Pennington Town Council) that a significant section of text published under Strategic Site 5 should have been included under Strategic Site 6. There has been no public correction of this or re-publication of the document by the District Council so the public is expected to guess which text is affected and where it should go. This is an inadequate approach to public consultation and undermines public confidence in the process.

Given that Lymington and Pennington Town Council are in the process of preparing a Neighbourhood Plan, the sections relating to Strategic Site 5 and Strategic Site 6 in the Strategic Sites Masterplanning SPD ought properly to be dealt with through the neighbourhood planning process. The duplication of materials covering the same matters in both documents is unnecessary and confusing and the imposition of detailed planning guidance by the District Council should not be allowed to override the provisions of a properly prepared Neighbourhood Plan given the clear requirements for community participation in their preparation and adoption. Moreover, this is necessary to ensure that any planning application on SS6 is considered in accordance with paragraph 125 of NPPF 2018 which provides "*Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.*" Accordingly, the draft SPD should be withdrawn and the layout and design of allocation SS6 dealt with within the neighbourhood plan if that allocation is upheld.