

## THE PARISH OF NEW MILTON NEIGHBOURHOOD PLAN

### REGULATION 14 REPORT

#### Purpose

1. The purpose of this report is to summarise part of the outcome of the consultation period on the Pre-Submission version of the New Milton Neighbourhood Plan held from 3<sup>rd</sup> April 2018 to 15<sup>th</sup> May 2018. The report reviews representations made by the statutory consultees, the Local Planning Authorities and by developers / landowners. It then makes recommendations for modifications to the Plan prior to its submission.

2. The report will be published by the 'qualifying body', New Milton Town Council, and be appended to the Consultation Statement that will accompany the submitted Plan in due course in line with the Neighbourhood Planning (General) Regulations 2012.

#### Consultation Analysis & Recommendations

3. During the consultation period, representations were made by New Forest District Council, the New Forest National Park Authority, Hampshire County Council, the Environment Agency, Natural England, Historic England, Southern Water, Peterhouse College, Pennyfarthing, Bradbeers, and Pure Town Planning Ltd.

1. New Forest District Council Planning Policy and Estates and Valuation Department
  - a. The Planning Policy team will provide detailed comments on policy wording to avoid any "unintended consequences" and to avoid duplication with their Local Plan Review. They also confirm Policy NM5 (land at Caird Avenue) is at variance with the existing Local plan policy, which the group will be aware, and further clarification will be required on deliverability on both the Sand and Ballast operation and the retail element. A meeting was held on the 12 September 2018 with the Planning Policy Team and its comments have been reflected in the Submission plan as detailed, per policy, below.
  - b. The NFDC Economic Development team are generally supportive of the NP proposal for Caird Avenue and the TC and Innovation/Business Centre policies.
  - c. The EV Dept indicates its land ownership interests related to Town Centre sites B, E, G and H and other policies and confirms that it would welcome working with the Town Council to deliver its town centre aspirations. Detailed comments are provided which the Town Centre Task Group have addressed. This has resulted in NMTC, NFDC and HCC working in partnership to bid to the 'Future High Streets Fund'.
2. New Forest National Park Authority indicates several areas in the text where their joint designation with NFDC is not acknowledged. They have some concerns about the proximity and impact of NM3 Brockhills on the National

Park and adjacent environmental assets and makes suggestions for minor clarifications to policies NM7E and NM12

3. Hampshire County Council:
  - a. The Local Highways Authority is supportive of Policy NM8 Transport and Accessibility although they would welcome greater emphasis on the identification of key pedestrian and cycle routes throughout the parish (e.g. 'spokes')
  - b. The Minerals and Waste Authority indicates the need to ensure the Hampshire Mineral and Waste Plan is acknowledged and matters that relate to NM4 Gore Road and needs to be satisfied that the strategic significance of NM5 Caird Avenue will not be prejudiced by the proposals.
  - c. The Flood Authority references the need to update the technical evidence listed in the Annex and the latest flood risk assessment has been taken into account.
4. The Local Education Authority confirms that no new schools will be needed to accommodate the planned growth and that existing school expansion can accommodate the proposed housing growth in the area. The LEA suggesting that paragraph 6.28 could be amended to more accurately reflect this position, but this is not considered necessary.
5. Environment Agency wishes to see greater reference to the natural environment in the plan objectives and policies and the opportunities available to enhance the Danes Stream and Becton Bunny through developer contributions and to encourage greater water efficiency through the design policy.
6. Natural England comment on lack of HRA screening assessment (pre Sweetman) and concerns regarding policies NM7e number of dwellings and do not accept the principle of NM9 as in their opinion, the policy deviates from the Mitigation of European Sites SPD.
7. Historic England wish to see greater emphasis on conservation and enhancement of heritage assets and welcome policy NM7d
8. Southern Water would like the inclusion of a utility infrastructure policy.
9. Peterhouse College suggest a delay in the submission of the plan until the Local Plan is tested through its examination and the new National Planning Policy Framework is published, as their promoted site lies within the Green Belt. Currently, NFDC do not intend to release this land from the Green Belt as it makes a strong contribution to Green Belt purposes and hence the changes to National Planning Policy (NPPF para. 136) are not considered appropriate.
10. Pennyfarthing consider that it is premature to determine housing mix in terms of policy NM3 Brockhills. The response also provides constructive comments about policy NM2 but does not consider the greenway approach reasonable in relation to Site NM7d and e. Policies NM3 and NM7d are not taken forward.
11. Pure Town Planning promote Green Belt land south of Gore Road west of and in the setting of the Grade II listed Milton Barns. The plan does not propose to apply paragraph 136 and the Submission Local Plan does not propose to release this land from the Green Belt.

4. As a result of the summary analysis of comments above, the recommendations on making modifications to the policies in final version of the Plan, are outlined below. The titles and numbering of policies are amended accordingly:

### NM1 A Spatial Plan for New Milton

In response to NFDC's comments, **it is recommended that minor amendments to clarify the policy application in Barton on Sea is made.**

### NM2 Diversifying Housing

In response to NFDC's comments, **it is recommended that the policy is amended to reflect Submission LP Policy 16 & 17 and to seek to promote housing suited to the first three of the following four categories set out in Submission LP Policy 16:**

- i. Homes suitable for first time buyers or looking to rent their first home**
- ii. Support for Undeveloped service plots**
- iii. Support for homes for private rent**
- iv. Discouraging housing for downsizing, sheltered housing etc.

### NM3 Land at Brockhills Lane – policy deleted

The strategic allocation is now included as policy SS10 in the NFDC Submission Local Plan (SLP) and the Draft Strategic Housing Allocations SPD illustrates a movement route through the site which addresses the SG's objective including a crossing across Sway Road to link with the National Park.

This pedestrian link should form part of link radiating out from the town centre and will be included in Policy NM14 'Promoting Walking and Cycling' and the route (from the Town Centre to SS10) to be included on the Policy Map.

**It is therefore recommended that the policy be deleted and the following matters the Group wished to retain (following the NFDC meeting in Sept 2018) are included as non-statutory proposals in the Implementation section of the Submission Plan.**

- **'Improvements to Sway Junction';**
- **'Pedestrian access from the Land to the East of Brockhills Lane into the NF National Park.**

### NM4 Land South of Gore Road – policy deleted

The strategic allocation is now included as Policy SS11 in the SLP but the proposed allocation excludes reference to a local shop or youth centre.

NMTC wished to retain the requirement for a local shop and youth centre within the NP policy. However, as these uses would now fall outside the boundary of the strategic allocation and within the Green Belt and are not exceptions to Green belt policy they would be 'inappropriate development in the green belt' and include an allocation in the NMNP for the Youth Centre on Green Belt land would not be in conformity with NPPF para 145 and 146 and hence fail the 'Basic Conditions'.

**It is therefore recommended that the policy be deleted and the Youth Centre proposal included as a non-statutory proposals in the Implementation section of the Submission Plan.**

### NM3 Land east of Caird Avenue

Due to site conditions resulting from previous mineral workings, the residential element of the scheme is no longer viable and is not being taken forward. The policy therefore updates policy NMT4 and 5 of the NFDC Site LP 2014 and the residential element of NMT4 will be addressed principally on sites in the town centre area.

**It is therefore recommended that the policy be amended to exclude residential development. The policy will include retail, commercial and business uses (as per the latest illustrative masterplan). It is also recommended that an additional clause is added to the policy as follows:**

***“to retain the existing shelter belt of mature trees / hedgerow and green verges along the western boundary of the site to maintain the green setting of Caird Avenue”***

**It is also recommended that the site boundary is redrawn to exclude the land to be retained for mineral activities as requested by HCC.**

### NM4 Design Quality

The policy has been renumbered (Pre-Submission plan policy NM16). In order to continue to encourage the rebalance of the demographic of New Milton, **it is recommended that a clause is added to the policy that encourages housing typologies suited to younger people and families and, in response to Historic England’s comments, an additional clause regarding heritage assets, as follows:**

***“Optimises the potential of the site to deliver housing typologies suited to younger people and families in accordance with other policies of the development plan”***

***“Development proposals should contribute to local distinctiveness and where possible should enhance local character and heritage including the special character of the New Forest National Park”***

And moving the biodiversity clause from Pre-Submission policy NM9 to the design policy:

***“In addition to the above requirements, all development proposals must ensure the protection of local biodiversity assets and should seek to provide additional habitat resources for wildlife and green spaces for the community that result in a biodiversity ‘net’ gain for the town.”***

### NM5 New Milton Town Centre Regeneration Area

In light of comments received from NFDC and the information currently being gathered for the Town Council’s bid to the Future High Streets Funding mechanism **it is recommended that the policy is amended to support town centre regeneration, and identifies opportunity sites where this might take place in its supporting text for those sites where specific details have not been made available to enable a specific allocation policy and merges the connectivity and public realm ambitions of Pre-Submission plan policy NM7c Environmental Improvement Area.**

#### NM6 Heritage Information Centre

The policy has been renumbered (Pre-Submission plan policy NM7a). **It is recommended that the policy is updated based on latest available evidence of proposals.**

#### NM7 Cultural/Arts Hub

The policy has been renumbered (Pre-Submission plan policy NM7f). **It is recommended that the policy is updated based on latest available evidence of proposals.**

#### NM8 Health & Wellbeing Centre

The policy has been renumbered (Pre-Submission plan policy NM7h). **It is recommended that the policy is updated based on latest available evidence of proposals.**

#### NM9 Innovation and Business Centre

The policy has been renumbered (Pre-Submission plan policy NM7i). **It is recommended that the policy is updated based on latest available evidence of proposals.**

#### NM10 Buildings of Local Heritage and Townscape Value

The policy has been renumbered (Pre-Submission plan policy NM7d). In light of comments from NFDC, **it is recommended that minor changes are made to include the Water Tower.**

#### NM11 Mitigating Effects on European Sites

The policy has been renamed and renumbered (Pre-Submission plan policy NM7e). In light of the recommendations of the Habitats Regulations Assessment (HRA), **it is recommended that the policy is amended to include a policy which supports the PUSH Policy 13 and policy text within the New Forest District LPP1 regarding wastewater treatment. It is also recommended that the policy within the Plan should include provision to ensure that development within the Parish over the Plan period will keep pace with treatment capacity and infrastructure so as not affect the integrity of the Solent sites.**

#### NM12 Promoting Walking and Cycling

This policy merges Pre-Submission plan policy NM8 Transport and Accessibility, NM9 Greenway and NM10 Walking Cycling to promote sustainable travel. An updated network of walking/cycling routes is identified on the Policy Map which may become possible SANG mitigation projects in the future in addition to Ballard Lakes Greenway which is currently being implemented. The policy will also include links ('spokes') radiating out from the town centre and rail station to promote safe walking/cycling links to the circular 'Green Loop' route also links to the National Park

and the sea. **It is recommended that these changes are made in light of comments received from NFDC and Natural England.**

In addition to the modifications recommended above, the following policies will be renumbered as follows and remain largely unchanged from the Pre-Submission version of the Plan:

- NM13 Barton-on-Sea
- NM14 The Rural Areas in the National Park
- NM15 Employment
- NM16 Tourism
- NM17 Early Years Facilities
- NM18 Education
- NM19 Connecting the Town

## **Summary**

The modifications made are not considered to introduce any new proposals and the recommendations update the policies in the Pre-Submission to accommodate comments from the District Council, the National Park Authority, statutory consultees, land interests and the recommendations in the SA/SEA and HRA reports.

Once the modifications, outlined in this report, are made, it is recommended that the Neighbourhood Plan can proceed to the Regulation 15 submission without further consultation.