



RESPONSE TO PUBLIC CONSULTATION NEW FOREST NATIONAL PARK LOCAL PLAN REVIEW 2016-2036

Introduction

This document represents the views of Ashurst Parish Council, following a considerable review process that included a working party of 4 Councillors. This response is made following a local call for views, a public information evening held on 8 November with David Illsley, Policy Manager NFNPA, and individual comments from residents. The content of any response was also discussed and voted at the last Parish Council meeting on 15 November 2016.

The draft Local Plan is a well-written, thorough, clear and comprehensive plan, written from the perspective of a protector of the National Park. It is designed to address the needs of this unique environment, as well as its residents and visitors and clearly seeks to protect the area, conserve its heritage, meet local needs for housing where possible and ensure the local economy remains strong. The Plan identifies an area for development within our community, as well as possible sites within other villages in the National Park.

The Councillors concur with the view of the plan author(s) that It is important to balance important habitats, green spaces and landscapes as well as ensuring the area has suitable homes for local residents and able to support the local economy.

After a thorough examination of the draft, a number of key general points were noted by the Parish Council working party when considering their response. These are contained in Annex A.

Proposed Development Site – Whartons Lane, Ashurst

The inclusion in the draft of the fields in Whartons Lane, Ashurst as a site for a housing development raised considerable concern among residents, for the following reasons:

1. Building on the proposed site would set a precedent for subsequent further development adjacent to the site, and reduce the 'buffer zone' between the village and the neighbouring town of Totton (despite the protection of many established trees with TPOs).
2. Whartons Close and Wharton's Lane are relatively low-density areas of development (10 and 17 dwellings per hectare (dph) respectively). The houses generally have long rear gardens with a large plot size to footprint ratio, which gives it a spacious and open character. Development here would lead to a higher density of properties which would affect the character of the area. More intensive development in this area would therefore be contrary to current policy and the Village Design Statement.
3. The site comprises open fields, which adds to the enjoyment and amenity of residents.
4. As a result of the location of the Foxhills Schools the traffic in Whartons Lane is already a well-known hazard. It is believed that any additional housing would add to what is frequently a chaotic and dangerous piece of the road network. It was highlighted by David Illsley that a development of 50 houses is unlikely warrant the need for the transport infrastructure to be

improved. The recent loss of the school bus service has added to traffic congestion in the area with over 60 children now unable to reach school by public transport.

5. Residents are concerned that the position of the plot, distance from the village railway station, the intermittent village bus service and location compared to shops and central services will have a material increase in the local car borne community.

At a public consultation on 8 November 2016, a straw poll was conducted following the imparting of key information on the whole of the Local Plan by David Illsley of the NFNPA and a representative of the Parish Council Working Party. This straw poll revealed that, based on the information they had heard, 76 of approximately 125 residents would still not wish for this green field site to be developed, with 14 residents showing support for some development to take place.

Therefore, following the work undertaken by the working party, as evidenced in the content and annex to this response, the Parish Council is united in its view that the principle of dwellings on the proposed site in Whartons Lane, Ashurst is not supported.

Recommendations

1. That the NFNPA do not include the Whartons Lane site for development in Ashurst and Colbury for the reasons stated above.
2. Through the next stage in the Plan preparation process, more suitable brownfield sites within the village be identified for development instead, including:
 - a. 174 Lyndhurst Road (the car wash facility)
 - b. The site of the telephone exchange near the Hospital
 - c. Quite possibly at some point in the future, the site of the Hospital itself once its future is determined.
3. Page 19 Policy 2. The Parish Council would recommend an additional point which requires an assessment of the impact of any required infrastructure around major developments.
4. Page 21 para 4.15. The NFNPA should consider the vital / local services required to support up to 5% population increase in Ashurst and how they will they affect these. Currently, for example, there is no doctor or pharmacy for 60% + retirees in Ashurst.
5. Page 25 para 5.11. The NFNPA should consider how they will ensure applicants' Habitat Regulations Assessments (HRAs) comply with national standards to ensure these assessments are independent.
6. Page 46 para 7.13. The NFNPA are advised to ensure that, in supporting the housing needs of the elderly population, the greater needs of this demographic are provided for, including support structures, care facilities, specialist care services etc
7. Page 46. A projected 28% growth in the 65+ age bracket from 2011-2021 suggests that at least 28% of open market dwellings should be for older people.
8. Page 48 Policy 20. References in the Local Plan to monies arising from the Community Infrastructure Levy (CIL) for development activity in Ashurst and Colbury should relate to their benefiting the community as a whole rather than just towards improvements in the Whartons Lane recreation ground.
9. The Plan states that the focus is on local affordable housing for rural workers. Guarantees are required that the housing allocation process will bear out this objective through the NFDC Homeseach allocation scheme bands.
10. That the NFNPA should consider its guidance on development in rural exceptions sites to reflect:
 - a. 2-bedroom shared ownership starter homes (making these properties much more flexible in the future as potential dwellings for older residents who wish to down-size)
 - b. small bungalows / other suitable accommodation for elderly residents.
 - c. open market housing.

Conclusion

The Parish Council has worked hard to understand the Local Plan and to match it with the needs of the community, as well as its commitment to its statutory purposes.

This report provides comments and recommendations on how the Parish Council feel the NFNPA might achieve this. It is hoped that it reflects the majority of the views and concerns of the village in terms of the future of the National Park and its response to the challenges laid down by the needs of the population.

Finally, whilst the pressures on the National Park and Ashurst's responsibilities as a defined village are acknowledged and appreciated, it is felt that there are more suitable sites within the village which would accommodate the need for affordable housing than the proposed site in Whartons Lane, Ashurst.

The Parish Council does recognise however, that despite this response, there is a possibility that the National Park Planning Authority might reject the views contained in this document, and continue to include the site in the revised Local Plan.

Should this prove to be the case, **then whilst continuing our opposition on a non-prejudicial basis, there are a number of conditions that the Parish Council would expect to be included in the revision,** and these are set out in Annex B.

Key Points – General

The Council notes and supports the following important points from the draft Local Plan:

1. The New Forest is 'under intense pressure from development in surrounding urban areas'
2. Planning permission will only be granted for major development within the National Park in exceptional circumstances (Policy 2).
3. The draft Local Plan specifies that development will be focused towards the most sustainable locations within the Park with access to local services.
4. The opportunities for creating a 'green halo' for the National Park– a buffer around our boundary – will be discussed with neighbouring authorities and other organisations.
5. The Authority would welcome proposals from communities to identify local Green Spaces within their communities.
6. The Authority recognises the important point that small scale household development can lead to 'creeping suburbanisation of the National Park'
7. New housing in National Parks is expected to meet the needs of local affordable housing needs rather than external demands. This affordable housing should remain so in the long term.
8. The NFNPA acknowledges that it cannot meet the area's full housing need (as identified by the SHMA) and states that it will engage with local authorities to see if housing needs can be met outside the Park.
9. The NFNPA states that the Government itself suggests the outcomes of SHMAs are 'untested' and should not automatically be seen as a proxy for a final housing requirement' for assessing local housing need.
10. The need identified by the SHMA (2011-2031) is 140-164 houses per annum (affordable + open market) – a total of 2,800-3,280 dwellings over the Plan period of 20 years – compared to an average of 24 per annum since 2006. The Assessment far exceeds an appropriate level of development in the National Park.
11. The proposal by NFNPA of just 700 dwellings in total, although it is understood that this figure is yet to be refined by further public consultation and a call for brownfield and windfall sites.
12. The SHMA for New Forest District Council showed 99% of the predicted population growth 2016-2036 in the area will be in the 65+ retirement bracket, which are currently external to the area.
13. The same SHMA projected a continued growth in the 65+ age group of 28% from 2011-2021 in the NFNPA area, which includes a 36% growth in the 85+ age group.
14. There is concern that because the NFDC draft Local Plan clearly focuses on meeting the housing need identified by the jointly commissioned SHMA, that this and other NFDC planning policy decision-making may, in turn, affect the New Forest National Park as a collaborative planning authority. The NFDC draft Plan also suggests development on Green Belt land – in fact much of the Green Belt land it proposes developing is classed as 'strongly performing'. Again there are concerns that, if implemented, this will impact on policy plans in the National Park.
15. Provision of new specialist accommodation for older people will be supported in the 4 defined villages.
16. The SHMA identifies a need for smaller homes (1-3 bedrooms). Existing homes in the National Park are heavily skewed towards larger, detached properties. Therefore, new dwellings permitted within the National Park will have a maximum total floor area of 100 square meters.
17. There is little room for development within the Ashurst village boundary.
18. The NFNPA note that the Ashurst and Colbury Village Design Statement expresses a desire to keep the fringes of the village green and prevent the development of greenfield areas.
19. Proposed development sites identified from the 'call for sites' for the National Park show that considerably more land is proposed for development in Ashurst based on village population, than Lyndhurst or Brockenhurst.

Ashurst and Colbury Parish Council's expectation of any development on Whartons Lane Site features in the Local Plan

- i. The site would remain outside the village building boundary.
- ii. There would be no further development beyond the boundary of the site.
- iii. The dph would not exceed that of the Whartons Close
- iv. None of the dwellings will comprise more than two floors.
- v. No more than 50% will comprise 2-bedroom shared ownership starter homes.
- vi. No less than 25% to comprise small bungalows allowing for elderly residents.
- vii. No less than 25% to comprise open market housing.
- viii. There must be a clear buffer zone between the development and the gardens of the adjacent housing in Whartons Close.
- ix. Any monies arising from the CIL should go to benefit the community (to be agreed with the Parish Council) and not towards improvements in the Whartons Lane recreation ground.
- x. Tree Protection Orders on all the site and adjoining boundary must be retained.
- xi. Construction of dwellings and environs must be in accordance with the principles of the Village Design Statement and NPA planning authority.