



New Forest National Park Local Plan Review: Consultation on potential alternative housing sites (June – July 2017) Summary of consultation responses – August 2017

The six-week public consultation on potential alternative housing sites ran from **14 June to 26 July 2017**. As part of this consultation, statutory consultees, other consultees and everyone who has commented to date on the Local Plan review were notified. In addition, the National Park Authority held a number of public drop-in events in the National Park which were attended by over 200 people.

The following tables summarise the main points raised by the 57 individual respondents during this six-week public consultation (many of the respondents made multiple comments). The first part of the summary focuses on the four potential alternative development sites identified in the consultation document, with the final table summarising the other comments received during the public consultation. Respondents included a number of statutory consultees (e.g. Natural England, Environment Agency), local town and parish councils, neighbouring planning authorities (e.g. New Forest District Council, Test Valley Borough Council), local residents and site promoters.

Timetable and Next Steps

All of the comments received during the six week public consultation on potential alternative housing sites will be considered, alongside those submitted during the consultation on the Authority's Draft Local Plan (October 2016). Ultimately the representations received will feed into the preparation of the Submission Draft New Forest National Park Local Plan 2016 – 2036 (Regulation 19 stage). This is due to be prepared by late 2017, with the final stage of public consultation due to commence in January 2018.

Site 1: Land at Ashurst Hospital (27 comments)	
<i>Area of Comment</i>	<i>Summary of main points raised</i>
Principle of development (15 comments)	<p><u>Positive comments</u></p> <ul style="list-style-type: none"> ▪ Support the principle of brownfield development sites in the National Park being brought forward. The Ashurst Hospital site is well located for local services and transport and is well suited to being redeveloped to provide housing for the ageing population of the area. ▪ Appreciate the need for the existing Birthing Centre to operate efficiently. To accommodate this, the site would be best suited to a single management use of older people’s accommodation, either warden assisted apartments, or a care home. ▪ The site should be considered for social housing, comprising small units for local people (similar to the NPA affordable housing development in Bransgore). <p><u>Negative comments</u></p> <ul style="list-style-type: none"> ▪ The future release of this land is uncertain in terms of its availability and the timescale of such release. Alternative sites should be identified. The site should only be available for NHS use. ▪ Reference to potential business development on the site does not appear compatible with the aim of a residentially-led redevelopment of the site. <p><u>Other comments</u></p> <ul style="list-style-type: none"> ▪ This site could take more than the 30 dwellings indicated in the consultation document. With this brownfield site available for development, the greenfield site at Wharton’s Lane should be deleted. ▪ The Hospital site should be developed as an alternative to the Wharton’s Lane site, not in addition to it. Development at Wharton’s Lane would reduce the strategic gap between Totton and Ashurst and would set a precedent for future development of greenfield sites on the edge of the village.

<p>The need to preserve the historic buildings on the site (3 comments)</p>	<ul style="list-style-type: none"> ▪ There are some existing historical buildings on the site that should be preserved. Concerns regarding the potential loss of the historic chapel which was erected in the 1850s. It is of local historic interest and there would be significant opposition to its removal or change in its appearance.
<p>Re-provision of health care services (1 comment)</p>	<ul style="list-style-type: none"> ▪ Evidence sought as to where the existing health care services on the site will be re-provided.
<p>Proximity to protected habitats (6 comments)</p>	<ul style="list-style-type: none"> ▪ The site lies immediately adjacent to the New Forest SSSI – concerns over creeping suburbanisation. ▪ The site was originally used as the New Forest Union Workhouse in the 1830s. It is unclear whether the site on Crown Land was gifted or sold, and whether commoning rights have been extinguished. ▪ Do not agree with Natural England’s stance, which conflicts with the Government’s aim of delivering new housing. Habitats should not be given priority over the need for local people to have homes. ▪ Understand the implications of the Natural England 400m advice and that this will affect the eventual use of the site. However there are already many buildings and a large campsite within this 400m boundary. Support the provision of affordable housing or retirement housing on the site.

Site 2: Land at Uncle Tom's Cabin, Romsey Road, Cadnam (39 comments)	
<i>Area of Comment</i>	<i>Summary of main points raised</i>
Principle of development (13 comments)	<p><u>Negative comments</u></p> <ul style="list-style-type: none"> ▪ Concern that allocating a predominantly greenfield site for residential development in Cadnam will set a future precedent, changing the general feel of the village. <p><u>Other comments</u></p> <ul style="list-style-type: none"> ▪ Under the current right to buy legislation any affordable dwellings would be lost in 5 years. Can the NPA guarantee the affordable housing would be given to local people in the parish in housing need. ▪ The inclusion of a few units for sale on the open market to subsidise the required affordable housing is noted. It is suggested that the development should be led by a Housing Association.
Objections to the scale of development proposed (6 comments)	<ul style="list-style-type: none"> ▪ 20 dwellings is too dense given the character of the area. There is no reasonable access unless Uncle Tom's Cabin itself is knocked down. The lane is very narrow with farm machinery using it. ▪ The relatively shallow depth of the site may make it difficult to construct the new dwellings without harming the amenity of the existing residential properties fronting onto Romsey Road, which is a key consideration within the consultation paper. ▪ The traffic generated by 20 additional dwellings accessing the site off Romsey Road is a concern.
Objections regarding surface water flooding in the area (9 comments)	<ul style="list-style-type: none"> ▪ Surface water flooding is considered to be the most pressing issue identified. ▪ Surrounding houses are already subject to flooding due to some ditches being piped (thus reducing the amount of water that can be carried/stored). Converting the rain 'run-off' area of a field into a road and buildings may have a huge impact on the local environment. In addition, the water table in the local area is very high and new development would result in the flooding of existing properties. ▪ The site floods for at least 2 months every winter and development would exacerbate this problem.

	<p>The entire site is identified on the Environment Agency website as being at high risk from surface water flooding. The provision of additional hard surfacing would make this worse.</p> <ul style="list-style-type: none"> ▪ The identified site is higher than surrounding properties and therefore the run-off from any development on the site would exacerbate surface water run-off.
<p>Objections regarding the sewage infrastructure capacity (2 comments)</p>	<ul style="list-style-type: none"> ▪ The existing sewage capacity in the area is substandard. ▪ Southern Water has assessed the existing capacity of their infrastructure and its ability to meet the forecast demand from this proposal. The local underground sewerage infrastructure in closest proximity to the site currently has limited capacity. This is not a constraint to development, provided connection to the sewerage network is made at the nearest point of adequate capacity, which would require the provision of new and/or improved infrastructure before additional flows could be accommodated.
<p>Objections regarding traffic noise (4 comments)</p>	<ul style="list-style-type: none"> ▪ The site is located within 100m of the M27 and is severely blighted by traffic noise. This problem would be difficult to overcome with standard noise abatement measures / acoustic screens.
<p>Public Right of Way (2 comments)</p>	<ul style="list-style-type: none"> ▪ The public right of way should be incorporated into the development. ▪ Concerns regarding the potential conflict of users of the public rights of way and the access to the potential development site.
<p>Alternative sites in the parish (3 comments)</p>	<ul style="list-style-type: none"> ▪ Consideration should be given to brownfield sites before greenfield sites are considered. ▪ Other sites should not be ruled out simply due to their proximity to the New Forest SPA.

Site 3: Land to the south of Fawley Power Station (42 comments)	
<i>Area of Comment</i>	<i>Summary of main points raised</i>
Principle of development (17 comments)	<p><u>Positive comments</u></p> <ul style="list-style-type: none"> ▪ The site promoters state that without development in the Park, the redevelopment of the Power Station site would not be viable and the significant economic, social and environmental benefits could not be achieved (jobs, improved visual appearance of the area, reduced pressure for housebuilding on greenfield sites, creation of new habitats to restore those lost following the construction of the Power Station). ▪ There are positive reasons in relation to the first two bullet points for the NPPF major development tests for the Fawley scheme (the need for the development and the lack of alternatives). Development in the Park in the form of SANGs and community facilities would enable more effective use to be made on the brownfield land for housing. ▪ There is a positive case for additional housing within the Park if it supports the viability and deliverability of the scheme as a whole. Overall benefits can be achieved in respect to the landscape of the Park and these can be managed through a suitable site development policy. <p><u>Negative comments</u></p> <ul style="list-style-type: none"> ▪ The NPPF states that housing sites should be deliverable and developable within the plan period - Fawley fails to meet this. The site is not allocated in the NFDC Local Plan; it is in Zone 3 for flood risk; is within a designated SINCC; and has a number of other designations including RAMSAR, SSSI and SPA. There can be no certainty over the delivery of the required housing within the Plan period. ▪ The National Park boundary was set in 2005 after extensive consultation, with the intent being to preserve its unique environment. It is not acceptable for developers to amend this boundary. The Power Station redevelopment should be contained within the existing brownfield boundary, and within this local infrastructure, affordable housing, schools and SANGs should be provided.

	<ul style="list-style-type: none"> ▪ The landscape and habitats of the National Park would be harmed by this development. There is no justification for what amounts to less than 10% of the housing proposed on the whole site. ▪ Private development of a brownfield site outside the protected landscape should not be allowed to expand into the National Park which would clearly be contrary to the two statutory National Park purposes. Development of the scale proposed is not in line with national planning policies on housing and major development. Land in the National Park could best support the redevelopment of the Power Station site by providing undeveloped greenspace. ▪ National Parks are treated differently in national planning policy for good reasons. It is important to accept that it is not possible to meet the full housing need for housing within the National Park given the wide range of designations. There is a strong case against the inclusion of this site. ▪ The demolition costs should have been factored in when deciding how much to pay for the site. If the case is now being made that housing is needed in the Park to compensate for the redevelopment costs of the Power Station site, the developer paid too much for the site.
<p>Form of potential development in the Park (8 comments)</p>	<ul style="list-style-type: none"> ▪ Fawley Power Station will make a significant contribution to meeting the identified housing need for both New Forest District Council and the National Park Authority. Land within the Park is proposed for larger detached housing with densities reflecting existing settlements in the New Forest. ▪ Potential development is constrained by HSE Exclusion Zones which requires the school to be located within the National Park. There are also a number of underground features which limit development e.g. foundations of the chimney, support structures for the dock and cable tunnels etc. ▪ The Fawley Waterside proposals include the delivery of SANGs within the National Park to reflect the landscape character of the Park. This will help to divert visitors from the New Forest SPA. ▪ If the site is to be allocated for housing, it is essential that the focus is on catering for the housing needs of local people rather than meeting external demand. Housing on the site must meet the needs identified in the New Forest SHMA (2014) and the priority should be on delivering small properties and maximising the amount of affordable housing.

	<ul style="list-style-type: none"> ▪ Dwellings in the National Park could be designed to showcase ecological value and sustainable development through the use of green technologies. ▪ Sceptical that any affordable housing will be built on the part of the site within the National Park. ▪ The location of the proposed school is not ideal, with no footpath access to the site.
Infrastructure improvements (7 comments)	<ul style="list-style-type: none"> ▪ There is no mention of the necessary infrastructure improvements. The A326 is operating above its capacity; there are no passenger trains; and the ferry service from Hythe is archaic. Development must be supported by improved road, rail, sea access and good digital/broadband connectivity. ▪ The A326 is already at capacity and there is no other viable route in and out of the Waterside. The road should be widened to a dual carriageway.
Flood Risk (1 comment)	<ul style="list-style-type: none"> ▪ Flood risk is correctly identified as a key issue on the land to the South of Fawley Power Station Site.
Impacts on protected habitats (8 comments)	<ul style="list-style-type: none"> ▪ Concern regarding the impact of development on Calshot Marshes and adjoining high value habitat. Creating SANGs would result in more impact if the overall aim is to encourage increased population to be more active. Access needs to be controlled through use of natural barriers to prevent people/cats/dog walkers/motorbikes going onto protected habitats. ▪ Strongly object to the development of SINC land. The development should be required to protect the SINC, not build on it. ▪ The SINC site is dominated by scrub, recent wet woodland, grassland and reedbeds. The nature conservation value of the SINC has declined. In the absence of management, the value will continue to decline. The objective is to restore the coastal character of the SINC that has been lost since reclamation in the 1960s. This will enhance the value of the adjacent coastal SPA, SAC and Ramsar.
Public rights of way (1 comment)	<ul style="list-style-type: none"> ▪ A public right of way runs along the top of the site. The right of way should be incorporated into the development, without adverse impacts on its quality. The route alignment for the England Coast Path in this area is being discussed with the landowner and is therefore a consideration.

Site 4: Land at St George's Church Hall, Calshot (22 comments)	
<i>Area of Comment</i>	<i>Summary of main points raised</i>
Principle of development (8 comments)	<p><u>Positive comments</u></p> <ul style="list-style-type: none"> ▪ The landowner confirms the land is available, suitable and deliverable for housing. The proposed allocation – as part of the wider approach to regenerating the Fawley & Calshot area – is welcomed. ▪ The provision of a relatively small amount of new dwellings in the village would benefit its well-being, in line with the Authority's socio-economic duty. ▪ Not averse to additional housing in the village. Would like a mix of higher quality private development. <p><u>Negative comments</u></p> <ul style="list-style-type: none"> ▪ The NPPF states that local planning authorities should identify sites that are deliverable and developable within the plan period. The site proposed at Calshot fail to meet this requirement. Given that the allocation of the power station site is at an early stage in the process of the NFDC Local Plan, there can be no certainty over the delivery within the Plan period. ▪ At present there are very few community services and facilities in Calshot. The NPA is reliant on these coming forward through a redevelopment of the power station. The provision of 30 houses is not in a sustainable location. ▪ No services in Calshot, public transport is poor. Development of the site would not be consistent with the strategic policies of the Plan and does not meet criteria for rural exception sites. ▪ Concern that building in this area will open the door for the redevelopment on the former Flying Boat Inn site. There is not adequate infrastructure to cope with this level of development. ▪ Query why the size of the proposed cemetery is being reduced, less than a year after the council said it was essential. Object to housing next to a cemetery which should be a quiet, peaceful place.

<p>Type of housing proposed (4 comments)</p>	<ul style="list-style-type: none"> ▪ Putting social housing in this location will impact on the residents as they may not have cars and the local public transport service is limited. Private housing would be better suited. ▪ Object to the proposed site being used for affordable / social housing on the basis that: (i) the site has long been identified as strategically important in the regeneration of the village; (ii) Calshot already has a disproportionately high level of low costs housing; and (iii) aware that other landowner's are looking to develop their sites. Would therefore like to see a co-ordinated plan to help regenerate the area. ▪ The village is already overcrowded with council properties. Tristan Close is badly looked after by the council tenants and adding more council houses will make it worse. The current ratio of open market to council housing is not right.
<p>Infrastructure requirements (5 comments)</p>	<ul style="list-style-type: none"> ▪ Both wastewater and water supply infrastructure cross this site. Development should avoid building over the existing infrastructure so it can perform its function effectively and allow access for maintenance. These structures require easements of 6 – 13m depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account. ▪ The proposed route of the England Coast Path runs along the south westerly edge of this site and is therefore a consideration. The precise location of the Path here is currently subject to revision. ▪ The road into the village is narrow and dangerous and therefore a traffic plan from the whole village is required. The development should include the refurbishment of St George's Hall, including adequate provision for the Calshot Nature Club. ▪ Would like to see some community facilities as part of the development, as the nearest shops are in Fawley and not within safe walking distance.
<p>Potential impacts on protected habitats (4 comments)</p>	<ul style="list-style-type: none"> ▪ The site constitutes part of the Brent Goose and Wader Strategy site reference NF155, which has a site classification for waders of uncertain use. This would require further investigation to clarify the status of land as supporting habitat for the bird species of concern.

Other Comments	
<i>Area of Comment</i>	<i>Summary of main points raised</i>
Natural England's advice on allocations within 400m of the New Forest SPA (8 comments)	<p><u>Positive comments</u></p> <ul style="list-style-type: none"> ▪ Support the fact that Natural England are now applying a consistent approach to potential development sites that might adversely affect the New Forest SPA in the National Park and New Forest District. It is recognised that this does not make the National Park Authority's search for potential housing sites any easier. ▪ Commend the decision not to allow new greenfield allocations within 400 metres of the SPA. ▪ Note that new greenfield housing allocations will not be considered within 400 metres of the New Forest SPA. This should also apply to potential development sites within the defined villages where development should also be prohibited. ▪ Welcome the decision of Natural England to give greater protection to the SPA by restricting allocations within 400m. This will hopefully result in added protection to the spacious areas on the edge of the villages, while enabling higher density proposals in central areas of the villages. <p><u>Negative comments</u></p> <ul style="list-style-type: none"> ▪ A great deal of money and time has been wasted by those who attended the public meetings last year. The policy that new housing should not be considered within 400m of the SPA was known prior to plan being produced. Perhaps it is now time for the National Park Authority to start putting the needs of local people to have affordable housing in their villages first, rather than worry about the rare birds - the habitat they need is found in abundance. <p><u>Other comments</u></p> <ul style="list-style-type: none"> ▪ Clarification sought that no new housing can be built within 400 metres of the SPA regardless of whether the project is for private or affordable housing. If that means that some villages cannot have additional housing in order to maintain the environment then that is a price worth paying.

<p>Alternative development sites (including the Lyndhurst Park Hotel site) (12 comments)</p>	<ul style="list-style-type: none"> ▪ Land adjacent to the railway sidings in Brockenhurst is suitable for employment uses, which could help release brownfield sites near the village centre for housing. ▪ Land north of Fir Tree Road in Cadnam is far more suitable and deliverable than the site identified by the National Park Authority. The site was submitted as part of the Authority's previous 'Call for Sites' and is therefore available for development. ▪ Land adjacent to Station Fields, Brockenhurst is suggested as a potential rural exceptions site. The affordable housing could be built to zero carbon standard and the site could accommodate 20 dwellings, including some plots available for self-build. Pedestrian access to the village is available. ▪ Keepers Cottage, Sway Road, Brockenhurst is a brownfield site on the edge of the village and is located outside the SPA 400m zone. The development potential of the site should be reconsidered. ▪ The Authority's duty to pay special attention to the desirability of preserving or enhancing the Conservation Area should be a more important factor in determining the type of development appropriate for the Lyndhurst Park Hotel site, rather than its proximity to the New Forest SPA. ▪ Providing specialist housing that is suitable for the Forest's ageing population is a vital component of fulfilling the Authority's socio-economic duty. Natural England's updated advice relates to greenfield site allocations and Natural England did not object to the previous application on the Lyndhurst Park Hotel site. The previous HRA screening work for the site concluded that the proposed use would not have a significant impact on the adjacent SPA when compared to the existing lawful use. ▪ The brownfield site at the Hyde Garden shop site should be reconsidered for allocation. The site is free from the major nature conservation constraint of proximity to the SPA. ▪ Support from the landowner for an alternative site on land at Ramley Road, Pennington, which is considered to be a more sustainable and deliverable option for housing. The promoter states that the site could accommodate circa 25 dwellings and is well located for the facilities in Pennington; there are no environmental constraints; no impact on the historic environment; very little ecological value on site and the visual impact would be negligible. The landowner states that compared to the sites south of Fawley Power Station and Calshot, the land has a positive or no impact.
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Impacts of development outside the National Park (2 comments)	<ul style="list-style-type: none"> ▪ Concerns regarding the significant number of houses proposed for the New Forest District area and the impact these developments and increased traffic and population would have on the Park.
Potential development at Church Lane, Sway (7 comments)	<ul style="list-style-type: none"> ▪ Concern that the proposed housing development at Church Lane, Sway may now not happen (or be significantly scaled back). There is a huge need for affordable housing in the village. Young people cannot afford to buy a house and are having to live at home with parents. ▪ Strong reservations regarding development on the remaining part of the Church Lane site. Facilities in Sway have diminished over the years with fewer shops, reduced bus service and overcrowded school. To enlarge the village or local school would be to irrevocably change the nature of the small rural community. Need to build new villages instead of adding onto existing settlements. ▪ As a result of the Natural England advice, the potential development site at Church Lane has been reduced from circa 5 hectares to just over 1 hectare. It would therefore be appropriate to revisit the original 'Call for Sites' assessment. Alternative brownfield sites such as the Dray's site have more capacity than the residual Church Lane site and are better located for local services. ▪ Too much attention is being paid to meeting Government housing targets rather than protecting the Forest. Need to prevent houses being sold to buy to let market as this does not benefit local people. ▪ Perhaps the National Park Authority could partner with New Forest District Council and a housing association to make this reduced development affordable and just for local people.
Infrastructure Capacity (2 comments)	<ul style="list-style-type: none"> ▪ The National Park Authority is advised to speak to Southern Water (as the sewerage undertaker) to ensure that foul water arising from the proposed developments can be accommodated. This should ensure that any upgrades that are required either to the network or waste water treatment works can be factored into both the cost and timescales for these developments going forward.
Coastal Access (1 comment)	<ul style="list-style-type: none"> ▪ A number of the proposed sites are in close proximity to the coast - Natural England has a duty to provide coastal access on foot around the whole of the English coast and is aiming to complete this by 2020. To find out progress of the England Coast Path, visit the Natural England website.