



New Forest National Park Authority

Summary of responses on Local Plan Consultation Draft (October 2016)

February 2017

Whole Plan / General Comments

Policy / Paragraph	Broad no of responses	Summary of main points raised
Whole Plan	4 comments	Support the whole Plan
Whole Plan	3 comments	The Plan is well written, clear and comprehensive and clearly seeks to protect the area, conserve its heritage & meet housing needs
Whole Plan	2 comments	It is important to balance protected habitats, green spaces & landscapes with ensuring the area has suitable homes & supports the local economy
Whole Plan	2 comments	Object to any building in the National Park
Whole Plan	1 comment	The Plan fails to meet the needs of older people in the Park. It needs to acknowledge and address the ageing population.
Whole Plan	1 comment	The Local Plan should explain how its policies benefit neighbours & the whole nation. The opportunity to include within Local Plan policies that clearly benefit the main people who visit the Park remains open and should be grasped.
General	1 comment	Christchurch should take some of the National Park's housing needs as part of wider vision for Christchurch.
General	1 comment	All adjacent local authorities need to work together to design a strategic Masterplan for the area so that housing and infrastructure can be organised in an integrated way.
Whole Plan	1 comment	Support focus on socio-economic needs of local people
General	1 comment	Support inclusion of Sandford principle
General	1 comment	Support focus on importance of climate change
Whole Plan	1 comment	It is unclear what infrastructure is required to support the proposed housing in the Plan
General	1 comment	The Local Plan should include a policy requiring provision for public access to the seaward side of any development or redevelopment, to facilitate the implementation of the Coast Path.
General	1 comment	The Local Plan should include a policy that applies to large scale sporting and other events to ensure that they meet the two statutory Park purposes. Several criteria are suggested.
General	1 comment	The Plan should include a new policy on boundary treatments
General	1 comment	Include additional points, including marine views, tenorial heritage and Estates & the role they play.
General	1 comment	The Plan does not sufficiently deal with the implications of people living longer, national health and lifestyle issue such as obesity, and changes to work patterns due to the digital revolution
General	1 comment	A policy that helps households who might wish to downsize should be included in the Plan.
General	1 comment	Redraw the Brockenhurst boundary to include existing properties at Black Knoll & Ober Farm, which are considered to belong to the village.

Executive Summary and Chapter 1 - Introduction

Policy / Paragraph	Broad no of responses	Summary of main points raised
Executive Summary	1 comment	The Executive Summary notes the major changes in the planning system since the creation of the Park but ignores the changes in housing policy. There needs to be an acknowledgement that greenfield housing sites will be required in the National Park.
Duty to Cooperate	1 comment	New Forest District Council formally notifies the National Park Authority that they are unlikely to meet their housing needs in full. The NFDC & the NPA will need to engage with neighbouring areas to explore where any shortfall might be made up.
Paragraph 1.6	1 comment	The Authority should demonstrate in the Local Plan how its historic evidence base has informed and influenced the Plan's policies and site allocations. Include reference to wider evidence base.
Paragraphs 1.10 - 1.11	3 comments	The Plan must contain policies which conform to the statutory Park purposes. No amount of changes in national planning policy can change that. It is considered that some of the draft policies do not comply with the statutory Park purposes. An undue emphasis is placed on the socio-economic duty.
Paragraph 1.13	2 comments	Given the scale of housing development planned in areas surrounding the New Forest, there needs to be dialogue under the duty-to cooperate on the provision of new recreational areas to serve the new developments.

Chapter 2 - Profile of the National Park

Policy / Paragraph	Broad no of responses	Summary of main points raised
Paragraph 2.2	1 comment	The NPA appears to have no strategic policy which addresses day visitors & impact on the National Park.
Paragraph 2.4	1 comment	The NPA should recognise and state in its plan that the habitat value of the New Forest SPA is declining.
Paragraph 2.6	1 comment	Reference could also be made here to non-designated assets in the Park, such as those identified on the Historic Environment Record and the local list.
Paragraph 2.10	1 comment	Although the Plan recognises the role of towns surrounding the National Park, the paragraph ignores the fact that these settlements are important sustainable locations for development.
Paragraph 2.11	4 comments	Context would be much improved if the actual level of unemployment (estimated at 0.4%) and the ratio of average house price to average wages (estimated at 14:1) were noted in this paragraph.
Paragraph 2.14	2 comments	Additional wording should be added recognising the impacts of light aircraft on the New Forest.
Paragraph 2.15	2 comments	Reference should be made to the Government's National Policy Statement on Ports, which includes specific reference to ports and National Parks; and also specific reference to ABP's existing and emerging Port Masterplans which set out the commercial case for Port development.

Chapter 3 - Vision and Objectives

Policy / Paragraph	Broad no of responses	Summary of main points raised
Key Challenges	8 comments	<i>General support for the key challenges identified, with some detailed points made, including the following:</i>
		Amend wording of key challenges to reflect positive strategy for historic environment.
		Where reference is made to the impacts of development being 'fully mitigated' this should not be merely a financial contribution, but alternative provision.
		New housing development will result in an increase in visitors to the New Forest. It will be vital that the NPA has a strategy in place for ensuring that these visitors do not have a detrimental impact on the protected habitats.
		Consideration must also be given to changes that will result from the decision that the UK will leave European in relation to European habitat protection.
		Within the key challenges section reference should be made to the delivery of housing within the National Park - the context for which is established within the Government's <i>National Parks Circular</i> (2010).
Strategic Objectives	11 comments	<i>The Strategic Objectives in the draft Plan were broadly supported, with some detailed points made including:</i>
		The objectives make it look as though the first purpose has greater importance than the second purposes, even though they are of equal importance.
		The NPA must foster the socio-economic well-being of its local communities. It is important that the housing needs of the Park's older population are met.
		Suggestion for an additional strategic objective recognising the need to ensure that development planned outside the Park provides mitigation measures.
		The objectives should deliver the appropriate type and amount of housing to ensure compliance with the NPPF. The objective should be re-worded to refer to a " <i>sufficient level of housing to meet local needs.</i> "
Vision	12 comments	<i>There was a view that the Vision could be made more succinct and the following more detailed comments:</i>
		The Vision is fine, although wordy. The Vision should ideally focus on what the New Forest will be like in 50 or 100 years time, and not be so short term.
		The Vision could be more prescriptive and look to achieve a net gain for biodiversity, seeking to restore habitats that have been degraded through inappropriate land use and/or management in the past.
		The Vision is much less positive about people's presence in the National Park than the Vision in Defra's 2010 Circular. Recreation and visitors are perceived as being a bad thing to be limited or even managed out of the Park.
		The Vision should be amended to reflect a more proactive approach to delivering housing within the Park and do more to meet local needs. The reference to ' <i>small scale housing development</i> ' in the Vision is inappropriate.
		The statutory purposes do not provide for the 'delivery of sustainable development' - its statutory duty is only to 'foster'. Any new development should be limited and only to meet local need.

Chapter 4 - Strategic Policies

Policy / Paragraph	Broad no of responses	Summary of main points raised
Policy 1 - Sustainable Development	15 comments	<i>A range of views were expressed on the draft 'Sustainable Development' policy. Some felt that as an area of restraint the Park should have a presumption against development. Others consider Policy 1 to be too restrictive and inconsistent with the NPPF. Detailed comments include:</i>
		Concerns raised regarding the impacts of PR Rights which are allowing more dwellings to be constructed without going through the formal planning route.
		In the context of the National Park, development can only be considered sustainable if it does not have an impact on internationally protected habitats.
		Support reference to the Sandford Principle within Policy 1.
		Object to the reference to the Sandford Principle which is a 40 years old. The Environment Act 1995 makes it clear that the two purposes are equal and the first purpose only takes precedence if there is a clear conflict.
		National policy is clear that National Parks are areas of restraint. The Plan should be much clearer in setting out a presumption against development within the Park. The criteria in policy 1 should be prioritised as d, b, e, c and a.
		Policy 1 has not been prepared in a positive manner as required by the NPPF. The NPA must look at all opportunities to meet its development needs and environmental constraints are not an excuse for failing to do this.
Policy 2 - Major Development	13 comments	<i>General support for the inclusion of a policy on major development in the Park. Some respondents felt that the bar had been set too high in the draft policy. Detailed comments included:</i>
		The Local Plan should provide coverage on how major development proposals that may come forward outside the Park and will affect it will be dealt with.
		Policy 2 should include an additional criteria relating to the impacts of the infrastructure required to support major development on the National Park.
		Policy 2 sets an overly high bar for major development to demonstrate it is in the "overriding public interest." This goes beyond the requirements of the NPPF and the word "overriding" should be deleted.
		The Local Plan should recognise the need for development at Fawley Power Station to take place on land within the National Park to support the regeneration of the Power Station site.
Paragraphs 4.8 - 4.9 -	5 comments	<i>The comments on the Fawley Power Station site were split between those promoting the site for development and respondents objecting to the principle of major greenfield development in the National Park.</i>

Fawley Power Station		Fawley Power Station is proposed as an alternative site allocation. The vision is to transform Fawley Power Station into a community of approximately 1,500 homes, employment and key services and facilities. The majority of the homes would be in New Forest District on brownfield land. Some homes are proposed in the National Park at Tom Tiddlers Ground and Calshot village. New greenspace, a primary school and SANGS are also proposed.
		The recognition of the Fawley Power Station site in the draft Plan is welcomed. Given its significance, it is important that the respective Local Plans for New Forest District and the NFNPA are closely aligned. A sensible approach would be to jointly allocate the site in the two respective Local Plans.
		The redevelopment of the Fawley Power Station site should not encroach into the greenfield land of the Park. To do so would be contrary to the statutory purposes. Redevelopment should be strictly limited to the brownfield site.
Paragraph 4.10 - 4.13 - Dibden Bay	6 comments	<i>The main comments on the paragraphs regarding Dibden Bay included:</i>
		Para. 4.10 presents only a partial picture of ABP's strategic land reserve. Dibden Bay was reclaimed for port expansion and the site is operational Port land as defined in the Town & Country Planning Act 1990. The land is safeguarded for minerals and waste use in the adopted 'development plan'.
		ABP welcomes the recognition that future port development on its strategic land reserve may well involve land that is within the National Park. That being the case, an indication in the emerging plan of the factors the NFNPA considers need to be taken into account in such circumstances, is also welcomed.
		Whilst future port development at Dibden Bay would likely be of a scale that would qualify as a Nationally Significant Infrastructure Project (NSIP), this may not be the case in all potential circumstances.
		National policy contained within paragraph 116 of the NPPF only applies to major development <i>in</i> the National Park. To reflect national policy, therefore, the policy tests in this paragraph can only relate to development within the National Park when they are considered to constitute major development.
Paragraphs 4.14 - 4.18 - Spatial Strategy	22 comments	<i>The majority of the representations on the Spatial Strategy sought a more enabling approach, with development supported in other settlements in the Park and adjoining adjacent urban areas. Detailed comments included:</i>
		To reflect the Authority's socio-economic duty, the bullet points in paragraph 4.15 should be extended to include reference to promoting development to meet local community needs.
		The spatial strategy fails to recognise all of the suitable locations within the Park that could accommodate sustainable development. One such location is Bashley which has access to the services of New Milton and is a more sustainable location than the smaller 'defined villages' identified within the Plan.
		The Spatial Strategy fails to recognise brownfield land as an important resource and as a suitable location for development in accordance with the Core Principles of the NPPF (paragraph 17). Criteria (e) should be re-worded to support the appropriate reuse or redevelopment of brownfield land.

		<p>Support the continuation of the general principle of the Spatial Strategy. However concerns raised that full consideration has not been given to the modification of the settlement boundaries. It would be sensible for the NPA to set out the modifications and invite comments.</p>
		<p>Disappointed that the “Community Routes” project is not mentioned in the current draft although there is a reference to “connectivity” (para 4.14).</p>
		<p>The draft Plan fails to comply with Duty to Cooperate as it is silent on the pressure for residential development arising from settlements on its boundary. The proposed housing allocations in the Park are all distant from surrounding centres. The Plan is flawed as it is inappropriate for the NPA to displace housing to outside the National Park without a clear mechanism to deliver these.</p>
		<p>The boundaries of the Defined Villages should not be altered. National Park status was supported by many as it was believed with this status it would not have further development. The villages should be protected as they lie close to neighbouring developing areas where there is capacity to develop and major development proposed.</p>
		<p>This policy takes no account of sites which are adjacent to the settlement boundary which is within the District Council area, which represent a sustainable form of development.</p>
		<p>Policy 3 is missing the crucial element covering the rationale behind the selection of sites to be proposed for allocation. A clear expression of the rationale supporting the spatial strategy or at least a distillation of it, should be included within the text of Policy 3, and not left as supporting text.</p>
		<p>There is no general restriction in principle or within National Policy which prohibits the extension of neighbouring urban areas across the National Park boundary subject to compliance with NPPF paragraph 115.</p>

Chapter 5: Protecting and Enhancing the Natural Environment

Policy / Paragraph	Broad no of responses	Overarching Issue	Summary of main points raised
Policy 4 and accompanying text	20	Majority of views want a strengthening of the policy for protecting the nature conservation sites	Support: There were 4 responses in support of the overall policy approach.
			Objections: There were 11 objections, but 10 of these were objections that <i>the policy was not strong enough</i> in its protection of the designated sites, and a variety of improvements were suggested. Only one objection thought the policy was too strict.
			Comments: There were 5 comments, with all of these either questioning the adequacy of the mitigation, or suggesting changes aimed at a stronger level of protection
			Comments and Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised were: a. Protection within 400 metres of the SPA should remain in place. b. Concern that mitigation measures are not sufficient, or effective enough to 'fully' protect the designated sites from new development.
Policy 5 and accompanying text	9	Majority of views want a strengthening of the policy for protection for the Natural Environment	Responses: There were 3 responses in support, 2 of which fully support the policy, and one which supports the protection of trees. There were 3 objections, of which 2 wanted improvements to strengthen the policy approach, and one thought the policy was too restrictive to deliver the infrastructure required for development. There were 3 comments, with 2 of these seeking ways to strengthen the policy approach, and one proposing an approach to be able to facilitate more development.
			Comments and Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised were: a. Suggestions were made to achieve 'net gains' in biodiversity. b. Concern about the amount and type of mitigation or compensation that is needed to avoid a loss of biodiversity. c. Greater weight in decisions should be given to developments that also provide benefits for wildlife.
Policy 6 and accompanying text	14	There were mixed views on this Policy and a range of detailed suggestions	Support: There were 4 responses in support, 3 of which gave general support for the policy, and one which supports, but wants to see greater protection of SSSI verges.
			Objections: There were 4 objections, 2 of which thought the policy too restrictive, one that criteria b) and e) were too vague, and one that wanted better clarity over the type of new tree planting.

			<p>Comments: There were 6 comments, with 2 of these seeking better protection of SSSI verges ways to strengthen the policy approach, and the rest making a variety of suggestions.</p> <p>Comments and Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised were:</p> <p>a. Newly planted trees should be of local provenance and sympathetic to the New Forest landscape.</p> <p>b. It is claimed that Criteria (f) and (e) are restrictive and do not show 'balance' as suggested by the NPPF - as development inevitably involves some negative impact on amenity.</p> <p>c. Concern about parking on the SSSI verges.</p> <p>d. Suggestion to restrict both excessive highway signage and advertising signs.</p>
Policy 7 and accompanying text	7	There were a range of detailed comments & suggested wording changes.	<p>Responses: There were 4 responses in support, 3 of which gave general support for the policy, and one which supports, but had concerns about the outflow from the sewage works for the main villages. There was 1 objection that wanted reference to the EA Groundwater Source Protection Zones. There were 2 comments, with specific suggestions.</p> <p>Comments and Suggestions: There were a range of detailed comments & suggested wording changes.</p>
Policy 8 and accompanying text	18	Strong support for working with adjoining authorities to develop green infrastructure. Slightly more support than opposition to the approach to SANGs.	<p>Support: There were 6 responses in support. Support covered a range of issues in the Policy, including that SANGs are not appropriate to locate within the Park to mitigate development outside the Park.</p> <p>Objections: There were 5 objections. Two of these were concerned that allowing SANGs within the Park could lead to the loss of backup land for commoning, and result in unnatural hard landscaping, structures and fencing. Two others supported the use SANGs within the Park to mitigate development outside the Park.</p> <p>Comments: There were 7 comments, including on the SANGs issue and on working with surrounding authorities to delivery green infrastructure and mitigate the recreational pressures on the Park. There were a range of other suggestions.</p>

			<p>Comments & Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised were:</p> <p>a. It is proposed that the NPA work with neighbouring Local Authorities to develop a strategic approach to the provision and location of green infrastructure. The 'Green Halo' concept is supported by one respondent.</p> <p>b. There is more support than objections for the Policy approach that provision of SANGs <u>within</u> the National Park to mitigate development <u>outside</u> the NP is not appropriate. One objection suggested that Policy 8 directly conflicts with the Statement of Common Ground signed by the Authority as part of the Christchurch Core Strategy examination relating to the Christchurch urban extension. The same respondent believes that the area outside the Perambulation was included within the National Park specifically for recreational use, and, therefore, a SANG would be suitable. There are views that the criteria for considering an exception to the SANG policy are too restrictive and not consistent with the NPPF, whilst others believe that SANGs design need to reflect the first and second purposes and avoid hard landscaping, structures and fencing.</p>
Paragraph 5.25	1	RMS group needs help to achieve aim	<p>Response: It is suggested that there has been limited achievement of the Recreation Management Strategy group over last 10 year and it needs help to achieve its aims.</p>
Policy 9 and accompanying text	11	Some support for policy but also a range of objections that seek exceptions to the Policy.	<p>Responses: There is reasonable support for the Policy, with some objections are seeking a strengthening the delivery of open space and some seeking exceptions.</p> <p>Comments & Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised were:</p> <p>a. New open space within developments should not count as mitigation for wider recreational impacts on designated sites.</p> <p>b. Concern that new open spaces do not become urban parks but support bio-diversity.</p> <p>c. Surrounding planning authorities should also apply this approach to take pressure off the Forest.</p> <p>d. Objections include a suggestion of an exception for the provision of essential utility infrastructure; a suggestion to avoid prejudicing the ability of public bodies to deliver education improvements being funded by the disposal of surplus land within school sites; and suggestions that the loss of open space should be accepted where the loss is justified by meeting an identified need (such as housing).</p>
Paragraph 5.28	2	New Local Green Space proposed	It is proposed to designate land at Highwood Road, Brockenhurst and Stanford Rise in Sway as a Local Green Space

Policy 10 and accompanying text	11	A range of detailed comments & suggested wording changes.	Comments & Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised include: a. Should reduce travel by vehicles through the Park by supporting improved public transport, electric car use and joined up cycle tracks; b. Encouraging the design of energy efficient homes, and more detail to assist with a move to a low carbon economy, supporting renewable energy development, biofuels and low and zero carbon development.
Policy 11 and accompanying text	4	A range of detailed comments & wording changes.	Responses: There were a range of detailed comments & suggested wording changes.
Policy 12 and accompanying text	4	A range of detailed comments & suggested wording changes	Comments & Suggestions: There were a range of detailed comments & suggested wording changes. The main issues raised were: a. Should include the requirements of paragraph 114 of the NPPF; b. Should include a reference to how the creation and preservation of the Coast Path and the Access Land associated with the path can help maintain the network of green infrastructure.
Policy 13 and accompanying text	5	Little objection to the Policy and the definition of small scale	Response: There is little objection to the Policy, with support for the use of wood and the benefits of well managed woodland; A suggestion is to give more detail to assist with a move to a low carbon economy, and to support renewable energy development, and biofuels.
Policy 14 and accompanying text	11	Majority of views want a strengthening of the policy for protection of Tranquillity	Response: There were 4 support, 4 comments and 3 objections, but most of the objections and comments were that the policy was not strong enough in its protection of Tranquillity. There were a range of detailed comments & suggested wording changes, including: a. Tranquillity could be significantly compromised if large scale developments are permitted around the Park's perimeter. b. Artificial light and unnecessary light should be discouraged. c. The Policy needs to tackle the main sources of noise pollution - i.e. the A31 and aircraft noise. d. 'mitigation measures' need to be defined and strengthened to ensure the tranquillity is not lost.

Chapter 6: Protecting and Enhancing the Historic and Built Environment

Policy / Paragraph	Broad no of responses	Overarching Issue	Summary of main points raised
Policy 15	3 Comments	Policy 15 Support	General support
Policy 15	5 comments	Policy 15 detailed comments	Make policy more proactive in conservation & enhancement of the historic environment
			include reference to conservation areas & SAMs & importance of conserving heritage assets for future generations
Policy 16	3 comments	Policy 16 Support	General support
			Broad support for references to local distinctiveness
Paragraph 6.14	2 comments	Detailed comment	Support reference to maintaining grass verges
Paragraph 6.20	1 comment	Detailed comment	Support reference to VDSs
Policy 16 & 17	2 comments	Local Distinctiveness	Consider reference to use of planning conditions for boundary treatments, height of properties & driveways
Policy 17	3 comments	Policy 17 Support	Broad support
Policy 17	1 comment	Policy 17 Detailed comments	policy should not seek to maintain one particular architectural style
General		General detailed comments	Support text on listed buildings & conservation areas
			Include reference in para 6.2 to corrugated iron roofed barns
			Include a more detailed development management policy setting out the requirements of development proposals
			Add reference in para 6.3 to Historic Landscape Character Assessment
			Include reference in para 6.3 to ditches, banks & drains

Chapter 7 - Vibrant Communities

Policy / Paragraph	Broad no of responses	Summary of main points raised
Paragraph 7.4	2 comments	Paragraph 7.4 is much too weak and is not consistent with national policy. It is clear that the NPA is undertaking some engagement with neighbouring authorities, but there is no evidence that neighbouring areas will be willing to address the very substantial levels of unmet development need that the emerging Local Plan is proposing.
Paragraph 7.6	3 comments	The New Forest SHMA (September 2014) is accepted to be the most recent expression of the objectively assessed housing need for the National Park. However, the SHMA does not take as its starting point the most recent Household Projections that were released by DCLG earlier in 2016.
Paragraph 7.8	4 comments	National policy is clear that SHMAs are 'untested' and should not automatically be seen as a proxy for a final housing requirement for assessing local housing need - this is supported.
		The principal that the NFNPA should not have to accommodate all of the Objectively Assessed Need for housing is agreed. It is clear that the level of housing for the Park would be well below this figure, but Authority should be clear in how it has reached the final figure which the Park will be delivering.
		Under the duty to co-operate there are opportunities to work with neighbouring councils such as NFDC. The Fawley Power Station site is adjacent to the border of the National Park and it would be better to add houses there as there are far more amenities and a much better infrastructure already in place.
Paragraph 7.9	1 comment	Paragraph 7.9 states that second home ownership is estimated at 7%. The Local Plan could include restrictions in second home ownership as has been achieved recently in St Ives.
Policy 18	40 comments	<i>A wide range of views were expressed on Policy 18. Objections were received regarding too much proposed development, and equally strong representations regarding the lack of development proposed. Detailed comments included:</i>
		Agree in principle that the NFNPA should not have to accommodate the full OAN figure for housing and it is clear that the level of housing for the Park should be well below this figure, but the NFNPA should be clear in how it has reached the final figure which the Park will be delivering.
		The Local Plan should encourage any increase in housing stock to be in adjacent urban and suburban areas, outside of the National Park, where infrastructure is able to support an increase in population.
		It is not apparent from either the draft Local Plan or the Sustainability Appraisal report what alternative options the NPA has considered & tested in relation to both its spatial strategy (policy 3) & its policy for new residential development including the 700 home proposed target (policy 18).
		Any net new residential development within the National Park should be restricted to housing for local people in perpetuity. This could be achieved by local occupancy clauses. In other areas this helps to reduce house prices in perpetuity. This would address the 'affordability' issue.

		<p>Any additional brownfield sites identified through the Plan-making process that are allocated should result in an equal reduction in housing on proposed greenfield sites (i.e. not be additional, but instead of).</p>
		<p>700 new dwellings is an extraordinary amount for a National Park. The public come to see the beauty of the New Forest not urbanised villages. Since 2006 the NPA has permitted double the required number of dwellings in the Park. Houses should be built outside the Park and the NPA should discuss this with neighbouring authorities.</p>
		<p>It is not clear on what evidence 700 homes is considered to be the sustainable limit, or whether the NPA has looked beyond the SHLAA & Call for Sites responses for other potentially sustainable housing development opportunities.</p>
		<p>Query whether other spatial strategies have been considered such as defining settlement boundaries for other relatively large villages to enable some infill within them, or whether the NPA has investigated opportunities on land in the vicinity of the former Fawley Power Station site that could be brought forward.</p>
		<p>The housing need identified in the National Park amounts to over 3,000 additional dwellings, yet only 700 are proposed. Additional sites need to be identified as otherwise it will not fulfil the requirements of a plan-led system and will only encourage opportunistic applications on less suitable sites.</p>
		<p>For the avoidance of doubt it should be made clear that the draft figure of 700 additional dwellings is not a ceiling figure and that there is flexibility to provide for more housing which would go towards meeting the identified housing needs.</p>
		<p>The windfall allocations (400 dwellings) account for over half of the total number of houses to be delivered and seem excessively high. The number of windfall homes proposed is not achievable whilst maintaining the character and appearance of the settlements. It is suggested that the number of houses brought forward on allocated sites should be higher.</p>
		<p>The overall housing target of 700 dwellings is too much. The NPA should be lobbying Government to be exempt from meeting housing quotas.</p>
		<p>The draft Local Plan Review fails to provide adequate housing to accommodate the projected growth of households. The failure to plan responsibly will force young families to leave the Park, and increase the pressure on neighbouring authorities to meet the National Park's needs as well as their own.</p>
		<p>New residential development in the Park should be restricted to housing for local people in perpetuity. This could be achieved through local occupancy clauses which would reduce house prices. The Local Plan currently allows new housing for non-locals which is wrong. With occupancy restrictions non-locals would still have all the existing properties (15,000 dwellings) to choose from.</p>
		<p>The NFNPA has wrongly assumed that the allocation of sufficient sites to meet its full identified need for housing would conflict with the statutory Park purposes. There is insufficient evidence to demonstrate this.</p>
		<p>While it is correct to recognise that significant weight should be given to conserving National Parks, exactly the same weight should be given to meeting the housing needs of the area and boosting the supply of housing.</p>

		700 additional dwellings represents a woefully low level of development which is not consistent with national policy. There is no clear evidence base to support the figure of 700 dwellings which does not represent a robust assessment of the maximum level of additional housing that would be possible without jeopardising the two statutory purposes of the National Park. There is no exception in the NPPF from the need for all local planning authorities to take a positive view on growth.
Paragraph 7.12 - 7.13	11 comments	<i>There were split views regarding addressing the needs of an older population. National policy is clear that needs should be addressed, but concerns were raised about the demographics of the Forest. Detailed comments included:</i>
		The New Forest SHMA highlights the very considerable level of future need for specialist housing for older people. This issue is only briefly touched upon in the draft Local Plan and the absence of a policy to bring effect to the aspirations expressed in the support text is of concern.
		It must be made clear that any new accommodation for the elderly should not take place unless it is shown that it is to meet the demands from within the Park population and not meeting the demand from outside the National Park.
		Do not support further provision of specialist housing for older people. The New Forest National Park needs small affordable housing that can be used by young and old.
		There should be a provision for retirement housing, in suitable locations outside the four defined villages.
		The plan fails to emphasise the needs of older people. It is vital that the particular needs of older people are met. The plan should therefore acknowledge the Park's ageing population and the specific housing and community issues this leads to, and lend support to proposals that increase and/or improve housing for older people.
Policy 19 (size of new dwellings)	24 comments	<i>Around 30% representations supported this proposed policy. The majority of objections were received from developers who consider the approach to be onerous. Detailed comments include:</i>
		Support the provision of smaller units within the Park which will help with the affordable housing stock. Also support the removal of permitted development rights to help maintain these smaller houses and their affordability.
		Limiting floor space to 100 square metres is restrictive and may not be sustainable. The size restriction would prevent dwellings from being "family home". The South Downs NPA has now included a maximum upper limit of 150m ² within their draft policy which is considered more appropriate.
		There is no robust evidence to support the 100 square metre floorspace figure which is arbitrary. A more appropriate approach would be to be compliant with NPPF para 50 which seeks to deliver a wide choice of high quality homes, mix of housing in terms of size, type and tenure. The blanket removal of all residential permitted development rights is not justified nor positively prepared.
		The SHMA evidence is distorted and not correct. The Report does not at any time recommend only building small units in the Park. To urbanise the Park by seeking smaller units only will erode the character when smaller units should be in the District and larger units within the National Park.

		<p>Even the NPA cannot build family houses under 100 square metres. The 2 dwellings built at Bransgore are 108 square metres and houses under 100 square metres are not capable of accommodating a family. The draft policy is at odds with the Government's minimum standards on housing sizes so is unsound. The DCLG document (March 2016) makes it clear that Policy 19 precludes anything other than 1 or 2 bed units or poor quality 3 bedroom units.</p>
		<p>The Authority's AMRs show that there is an oversupply of small dwellings and an undersupply of family dwellings and the NPA should be seeking more 4 bed units to meet demands. The draft policy will encourage blocks of flats or terraces which will change the fabric of the built form of the villages.</p>
		<p>The policy fails to take account of how conversions work and how they can enhance areas by being sympathetic to the existing building fabric. Ask that the Authority removes the stipulation of the policy from conversions. The 100 square metre limit could still be used on allocated sites.</p>
		<p>Ask that the draft policy on dwelling size be amended so it only relates to affordable housing. Let the market and local context decide when developers apply for open market housing.</p>
		<p>The NPA has not provided viability evidence to show that Policy 19 and the 100 square metre restriction will allow for the construction of dwellings to comply with the Local Plan dwelling target.</p>
		<p>There remains a strong demand for all types of dwellings in the area, not just smaller ones. This policy will limit sites coming forward, especially when assessed in conjunction with Policy 34 on residential density. Policies 19 and 34 contradict each other and will lead to the inefficient use of land.</p>
		<p>This policy does not comply with Government policy and is unsound. The NPPF states that authorities should deliver a wide choice of homes; plan for a mix of housing based on current and future demographic trends. The 2014 SHMA highlighted the strong demand for larger properties arising from more established family units. There is clear evidence justifying a mix of house sizes and it is not the role of planning to inhibit market supply.</p>
Paragraph 7.19	1 comment	<p>Support the decision to review the settlement boundaries but disappointed that the review has not been taken before the draft Local Plan was published.</p>
Policy 27 (Affordable Housing)	17 comments	<p><i>There was some support for seeking a zero site size threshold for affordable housing. Many responses highlighted the need for a viability assessment to set the % target for affordable housing. Detailed comments included:</i></p> <p>Support the alternative option of seeking affordable housing on all development sites - i.e. maintaining a zero site threshold in light of the finite development sites in the Park and the issues with affordability.</p> <p>Policy 27 should not require extra care/assisted living schemes to provide affordable housing as there will be no incentive to bring forward such schemes and the need for bespoke accommodation for older people will not be met.</p> <p>If the alternative option of seeking to secure affordable housing on all sites is pursued, the NPA must test the viability of this.</p> <p>Support for the alternative option of seeking affordable housing on all development sites. It would be better for the NPA to try and fail given the poor record on affordable housing delivery in the Park over the last decade.</p>

		<p>It would be worrying if the Authority decided to instate its own threshold targets as set out in the 'alternative option', as this undermines the ethos behind national guidance, which has already considered the special circumstances of National Parks by setting a lower threshold of over five units.</p> <p>The policy does not address alternative types of affordable housing provision including starter homes. Policy 28 needs to recognise that market provision through starter homes and self-build are essential components of the solution to the housing crisis.</p>
Policy 28 (Rural Exception Sites)	29 comments	<p><i>A range of views expressed, with around 35% of respondents urging the NPA to allow an element of open market housing on exceptions sites to deliver more sites. Detailed comments include:</i></p> <p>Object to the alternative option of allowing an element of open market housing on rural exceptions sites as this would provide a loophole to avoid the provision of affordable housing.</p> <p>Rural exceptions sites are immoral & lead to creeping suburbanisation.</p> <p>Support the alternative option of allowing some open market housing - this is necessary to enable the delivery of affordable housing. The policy needs to define what proportion of market housing there should be.</p> <p>Criteria (d) - relating to proximity to local services - should be removed from this policy. The policy should apply to all New Forest villages, even where there are no "facilities", especially where villages are close by.</p> <p>This policy has delivered very few affordable homes and has relied on benevolent landowners donating land for development. The alternative option is a better option and at least provides an incentive to landowners. It is also consistent with national planning policy.</p>
Paragraph 7.44	1 comment	<p>The proposed approach to rural exceptions sites will drive down much needed development due to lack of financial viability. Rural exception sites are much more likely to be able to meet the expense of affordable housing if there is also a proportion of open market housing on any given site.</p>
Paragraph 7.46 - 7.49 and Policy 29 (Commoners Dwellings)	26 comments	<p><i>General support for including a separate policy on commoner's dwellings. A number of objections were raised to the principle of the CDS. Detailed comments include:</i></p> <p>Disagree that the lack of affordable housing is main threat to sustaining commoning. Commoning has been much more than sustained in the last few years as evidenced by the greatly increased numbers of animals on the forest.</p> <p>The title of this section should be changed from 'Commoners Dwellings' to 'Support for Commoning'. This would allow the Plan to address the needs of the commoners most in need of help and will shift the focus away from those in a position to finance their own dwelling</p> <p>The first part of this paragraph should explain that the scope of support for commoning has been widened. Redrafting is then required to refer to the greater requirement for back-up land over dwellings in order to help the commoners most in need.</p> <p>The supporting text to the Commoners Dwellings policy should be redrafted to set out how the three-stage process will be improved to overcome the problems with the scheme identified. It can work in conjunction with a revised and expanded set of Guidelines, but should cover the key policy issues.</p>

		<p>A separate Local Plan policy on commoners dwellings is essential if proper attention is be given to housing essential workers.</p> <p>The commoners dwelling scheme is unnecessarily restrictive, managerially burdensome and still remains untested in securing dwellings long term. The scheme should be directed towards those without substantial capital assets.</p> <p>Support the clear intentions and the straightforward evidence requirements set out in the policy 29 wording.</p> <p>Point c) should be reworded to require applicants to demonstrate why they must live on their back-up land when 50% of commoners do not find this necessary. The total floor area of barns and other outbuildings should also be limited to no more than the house i.e.100 square metres.</p> <p>The New Forest Commoning Review (2007) is not considered to be up to date. Since it was published in 2007 house prices have risen by around 18.5% and during the same period the number of depastured animals has increased by 43% from 7,452 to 10,714. Where is the evidence that a lack of affordable housing in any threat to the viability of commoning?</p> <p>The CDS has provided housing for less than 3% of all commoners. Because it is self funding it only supports the wealthiest commoners. Commoners do not need to live on their back up grazing.</p> <p>Lowering the size of the dwelling to 100 square metres is of very marginal benefit without any restriction on the size of the outbuildings. It is these accompanying outbuildings that are a blot on the landscape.</p> <p>The idea that the CDS could be extended to include provision of rented accommodation to better assist commoners on lower incomes is an excellent idea and most welcome. Help for commoners should be directed towards those in greatest need. This is where the current scheme is a complete failure.</p>
<p>Paragraphs 7.50 - 7.52 and Policy 30 (Estate Worker Dwellings)</p>	<p>25 comments</p>	<p><i>There was general support for the inclusion of a new policy on Estate Workers Dwellings. Majority of comments focused on the detailed wording, including:</i></p> <p>Amend the wording to: <i>“In considering proposals for new build dwellings for Estate workers the National Park will need to be satisfied that there is no existing appropriate accommodation potentially available & affordable.”</i></p> <p>There should be a definition of “Estate” to cover working Estates run as a business and contributing to the Forest economy. Concerns raised that owners of large private houses could apply for an estate worker's house in the grounds.</p> <p>Broad support except for criterion d) - relating to dwellings on the Estate having recently been sold or let to non-Estate workers. Some Estate housing may be more suited to private letting. The policy should not hinder this.</p> <p>The Estates Group welcome the policy but feel that clause (d) needed to be changed to make the policy workable. The policy should enable Estates to build new homes to meet the needs of Estate workers and there should be specific reference to retired staff. The location of new homes should be decided through Estates Plans to be agreed with the NPA.</p> <p>Suggest that a criterion (d) is reworded to state "No other <i>suitable</i> dwellings on the Estate have been sold within the last 5 years."</p>

		Request Policy 30(d) is reviewed. There are occasions when Estates cannot house new employees in existing housing. The policy may result in residential property being kept unnecessarily vacant for long periods of time.
		The potential for the threshold to be raised beyond 3 units to what is appropriate in the circumstances should be recognised:
		Support the policy. Remove clause d) as it does not take account of the fact that not all of the properties are appropriate for housing an estate worker. Not necessary to limit number of dwellings to 3 - every estate should be judged on its merits. Definition of an estate worker should be broadened. Should also include retired workers and their widow/ers on the grounds that estates often have a strong social responsibility.
		The policy restrictions on housing provided by the Estates are too restrictive to boost the supply of housing.
		In relation to the reference to a maximum of 3 units, for clarification it is assumed that this is the maximum for a given development site, and not an overall limit for the Estate as a whole over the whole life of the Plan.
Policy 31 (Agricultural and Forestry Workers Dwellings)	8 comments	Amend wording of criterion b) to read "The functional need could not be fulfilled by another existing dwelling unit, or any other existing accommodation in the area which is suitable, affordable and available for occupation by the workers concerned."
		Amend wording of criterion c) to read ""no other dwellings either on or closely connected to the holding/enterprise have been sold separately or in some way alienated from the holding/enterprise within the last five years. "
Policy 32 (Removal of agricultural occupancy conditions)	4 comments	Agricultural ties should be carefully monitored and this should include checks on whether large outbuildings are being converted to residential use.
		An additional point should be added to this policy stating that the removal of any agricultural occupancy condition should be replaced with a local occupancy condition.
		The Policy does not recognise that there may be circumstances when it may be appropriate to remove the condition from one property and transfer it to another dwelling. Add the following to end of policy - "..., <i>or the occupancy condition can be transferred to another property, where there is a demonstrable benefit in doing so.</i> "
Paragraph 7.61 (Self and Custom Build)	4 comments	<i>The responses received did not support the principle of Self and Custom Build, although this remains part of Government policy to address housing needs.</i>
		Do not support Starter Homes as they are not affordable & will not remain as starter homes in perpetuity.
		Support the Authority's view not to allow self-build on rural exception sites.
Paragraphs 7.62 - 7.64 and Policy 33 (Gypsies, Travellers & Travelling Showpeople)	1 comment	There is clear evidence of a shortage of accommodation for Travelling Showpeople in NFNPA. Draft Local Plan makes no attempt to resolve the accommodation crisis for gypsies, travellers and travelling showpeople. The 2012/13 study again identified need for 4 households in NFNPA by 2017. This need is very small but it appears that the NFNPA are unable to meet it. Netley Marsh site is already overcrowded. NFNPA have continually failed to meet their legal duty to provide a 5 year supply of deliverable sites for showpeople in line with DCLG Planning Policy for Traveller sites.

Policy 34 (Residential density in the defined villages)	7 comments	<i>The comments received generally highlighted the potential conflict between policy 19 on smaller dwellings, the need to make efficient use of land, and policy 34. Detailed comments included:</i>
		This policy is inappropriate for the centre of the defined villages where spacious residential plots on new schemes are inappropriate. The policy should recognise a tighter arrangement is permitted in the very centre of our villages.
		The more strongly worded policy relating to the residential density in the defined villages is welcomed. However, this policy may undermine the ability to achieve the windfall housing rates set out earlier in the consultation draft.
		Given the Local Plan support for the provision of smaller dwellings, increasing the residential density in the defined villages would be strongly desirable as it would lead to the provision of more smaller, cheaper houses.
		This policy is likely to conflict with Policy 19 which requires all new dwellings to be less than 100 square metres. The result of applying both of these policies is that sites will not be developed efficiently. This potential conflict will lead to uncertainty and may restrict the deliverability of sites.
Policy 35 (Replacement Dwellings)	25 comments	<i>The majority of parish councils supported the policy. Some respondents consider the policy to be dated and out of step with PD rights. Some support for a "2-for-1" policy subject to strict conditions. Detailed comments included:</i>
		Support the option of '2 for 1' policy subject to very strict conditions. If a small dwelling could be created out of a large dwelling this could solve the housing need for elderly people.
		Replacement dwellings should not be restricted to same size as existing dwelling. The defined villages should be excluded from this restriction and replacement dwellings should be proportionate to size of plot. 2 for 1 is a good idea. Conservatories should be allowed in addition to 30% if rule is retained.
		Do not support the weakened alternative option of considering proposals on a site by site basis.
		The replacement of mobile homes with permanent dwellings should be allowed if the agricultural worker has shown a functional need & complied with the conditions of the temporary planning permission.
		Support for aims of the replacement dwelling policy. Alternative Option c) - "2 for 1 policy" - is interesting and could be worth considering if it resulting in the provision of two smaller dwellings. Would support this if it meant getting some small houses in rural villages outside the 4 defined villages.
		The policy is in urgent need of review having been devised in the 1980s. There is confusion caused by the way the policy is interpreted. The mathematical approach to planning decisions should be reviewed. The base date of 1982 is arbitrary and applications should be accessed on a case by case basis.
		Have a rolling base date as is the case with lawful uses. In replacing a dwelling greater emphasis should be placed on what is there now, not what existed 35 years ago. Site characteristics may support larger replacements.
		Agree with the option of extending the policy that replacement dwellings should be of no greater floorspace than the existing dwelling to also cover the four defined villages to maintain local character.
		Strongly support the 30% policy on habitable floor space extension. Concerned if the alternative option in paragraph 7.71 involving more subjective criteria or an effective "two for one policy" were introduced. We are strongly opposed to the building of additional homes on split plots through "garden grabbing".

		<p>The "2 for 1" alternative, allied to the permitted 30% increase in floor area through extension and the current generous permitted development rights would result in 'developer heaven' with huge increases in size of buildings and population numbers. Intensification of people and cars would be detrimental to the first statutory purpose of the National Park.</p> <p>The alternative policy approach of no specific floorspace limitations would be welcomed as it would allow site characteristics to be considered. There is no justification for applying floorspace limitations within the defined villages. The alternative option of allowing larger properties to be sub-divided could helpfully secure some smaller dwellings without any physical extensions.</p>
Policy 36 (Extensions to dwellings)	12 comments	<p>Neither of the policies on replacement dwellings and extensions fulfil any legitimate planning objective. There is no published evidence to justify the purpose of the policies or whether their aims have ever been met. Applying an arbitrary percentage limit is unnecessary and adds no value to the process. The fixation with the 30% figure deflects focus from the more relevant planning considerations. If the LPA contends that there is a net loss of smaller properties through either their extension and/or replacement than it should be able to demonstrate this by reference to monitoring data. Policies 35 and 36 are now out of step with the provisions of the Government's permitted development regime which circumvent the aims of the policies.</p> <p>The definition of small dwellings must now change to 100 sq. metres or less.</p> <p>Experience shows that we need a better definition of when attached outbuildings may be included in the calculation of the total internal habitable floorspace of a dwelling.</p> <p>Criterion a) should be deleted as family needs should be known when someone buys a property. It is not the role of the planning system to make allowances and concessions for personal circumstances. An increase in the size of a family is not an exceptional circumstance.</p>
Paragraphs 7.76 - 7.78 and Policy 37 (Outbuildings)	9 comments	<p><i>General support for the policy, but a clear view that it could be strengthened further as outbuildings are being used to circumvent the restrictions on extensions. Detailed comments included:</i></p> <p>Fully support and endorse the concerns raised in paragraph 7.76 regarding the impact of ever larger outbuildings. This has been a significant area of concern within the parish.</p> <p>The policy on outbuildings should be strengthened with an indication of the sort & size of outbuildings that may be acceptable & a clear statement that outbuilding applications which are submitted to circumvent restrictions on residential extensions will not be granted.</p> <p>Policy 37 needs to be strengthened. Outbuildings should be subservient to the main building, but there is very little guideline in the policy as to what that actually means.</p>
Paragraph 7.79 - 7.81 and Policy 38 (Infrastructure Provision)	5 comments	<p>Some of the habitat mitigation measures given as examples in paragraph 7.81 (e.g. ranger provision, educational campaigns) do not represent mitigation over the life of the development.</p> <p>Include new wording to Policy 38: "<i>New and improved utility infrastructure will be encouraged and permitted in order to meet the identified needs of the community</i>"</p> <p>Would like to see contributions from new development support catchment priorities to protect and enhance biodiversity, reduce run-off and pollution and lower flood risk.</p>
Policy 39	5 comments	The retention of remaining riding centres within the New Forest should be explicitly included within Policy 39.

(Local Community Facilities)		<p>The NHS requires flexibility in its estate and therefore restrictive policies could prevent or delay required investment in services and facilities. There is a need to ensure that vacant NHS sites are not strategically constrained by local planning policies. There should be a presumption that where health facilities are no longer required, such sites are suitable for housing.</p>
		<p>Support the policy in seeking a positive & proactive planning approach. It would be useful if Policy 39 included some flexibility for development resulting in the loss of community facilities if it meets certain criteria that provides it has been re-provided or that it is surplus to requirements.</p>
Paragraph 7.86 - 7.89 and Policy 40 (Retail development outside the defined villages)	9 comments	<p>The existing policy restricting conversion to residential is coping well with these difficult circumstances and should be retained.</p>
		<p>The NFNPA should not stand in the way of applications to reconvert premises from shops where the premises were originally built as dwellings.</p>
		<p>Broadly support the concept of targets for various use classes within the main shopping areas to help maintain a balanced local economy on the High Street.</p>
		<p>Convenience stores should be fully supported and where demand is sufficient they should be allowed to develop further in appropriate circumstances.</p>

Policy 20: Land at Wharton's Lane, Ashurst

201 responses (146 of which were a signed standard letter containing 4 points)

Policy / Paragraph	Broad no of responses	Subject of response	Summary of main points raised
Policy 20 and paragraphs 7.20 - 7.22	6	Support	Ashurst is regarded as a sustainable location to accommodate residential development given the good variety of services and facilities and the excellent transport links.
	4		Support the building of more affordable homes.
	2		Development would bring in welcome funds e.g. repair substandard pavements, recreation ground improvements
	1		Support the building of more retirement homes.
	1		Building on this site would not impact adversely on the landscape and scenic beauty of the National Park.
Policy 20		Object	
	170 (includes 146 standard letter)	Traffic and access	Wharton's Lane is already busy (parking and traffic).
	11		Area around school is already busy and will only increase with this development.
	1		No suitable place for access road.
	2		Access will create an additional hazard along Wharton's Lane.
	2		Junction with A35 won't be able to cope.
	1		Increase in traffic will create hazard for users of recreation ground.
	165 (includes 146 standard letter)	Impact on wildlife/natural beauty	It is a site of natural beauty containing many species of wildlife. Development will lead to a loss of wildlife (deer, bats, foxes, horses, slow worms, newts and frogs).
160 (includes 146 standard letter)	Precedent	Building on this site will set a precedent for other fields in the National Park and surrounding Ashurst to be built on in the future (and lead to merging with Totton and Southampton)..	

	160 (includes 146 standard letter)	Greenfield / brownfield	The proposed allocation on the field in Whartons Lane is on a greenfield site. Consider brownfield sites before greenfield. Carry out a review of all brownfield sites in Ashurst. The following alternative sites in Ashurst are proposed: 174 Lyndhurst Road (Car wash); Telephone exchange near hospital; Hospital site in the future.
	5		Consider infill by building on large gardens
	11		Loss of local green space
	21	Flooding and drainage	Field is wet with culvert draining into Wharton's Lane/springs and development will result in flooding.
	17	Amenities	School is already full.
Policy 20	3		More people will result in more amenities being required.
Policy 20	9		There are no amenities in Ashurst to support the development
Policy 20	16	Tranquillity/ noise/ light pollution	Loss of rural feel, area will become more urbanised.
Policy 20	2		Will result in a visual intrusion/overlooking.
Policy 20	1		Will impact on St Joseph's Retreat which at present is a haven of peace and quiet.
Policy 20	4		Will result in loss of tranquillity.
Policy 20	12	Density	Small houses will not be in keeping with large houses which surround the site.
Policy 20	4		High density will spoil the rural character which will be at odds with the VDS.
Policy 20	11	Trees and hedgerows	Trees (TPOs) and hedgerows will be affected.
Policy 20	6	Location	Site is not well located for amenities of Ashurst, shops, railway station etc. and will result in more car use.
Policy 20	7		Should build on west of Ashurst not east to prevent merging with Totton and Southampton.
Policy 20	1		Should be no development outside village boundary.
Policy 20	7	NP purposes	Development is at odds with NP purpose to conserve wildlife, natural beauty and culture.
Policy 20	5	House prices	Will decrease in area as a result of building social/rented housing and houses won't sell.
Policy 20	3	Back-up grazing	Will result in loss of back-up grazing land.
Policy 20	2	Demographics	Needs of young (affordable housing) and ageing population (retirement homes) are met elsewhere e.g. Totton and Southampton.
Policy 20	1		There is no work for young in Ashurst.
Policy 20	1	Infrastructure	Sewerage infrastructure has limited capacity.
Policy 20	1	Crime	Will result in an increase in crime.
Policy 20	2	Housing Type	Proposed housing not suitable for ageing population.

Policy 20	2		Proposed housing not really affordable and could be sold off under new government rules.
Policy 20	1	Major development	Constitutes major development in a National Park and shouldn't be allowed.
Policy 20	1	General comments	Need to ensure the foul water arising from the proposed development can be accommodated (Southern Water).
Policy 20	1		Location and number of dwellings has implications for school places (HCC).
Policy 20	1		Consolidating the provision of new housing development to create opportunities to expand existing schools would provide the best opportunity to create additional school places close to the areas of new housing development (HCC).
Policy 20	1		Consider access to school serving the development to promote opportunities for walking and cycling to school (HCC).
Policy 20	1		Consider sites adjacent to larger settlements outside the Park.
Policy 20	1		The Ashurst Village Design Statement is out of date and was not subject to robust public examination during its production. Expression of design considerations and should not be relied upon to inform location of new development.
Policy 20	1		Consider a specific policy to maintain settlement gap between Ashurst and Totton.
Policy 20	1		73% (i.e. 163 units) are located on sites within 400m of SPA. The site at Whartons Lane, Ashurst is one of the few proposed housing sites not adjacent to a protected habitat.
Policy 20	1		Housing should be affordable, but make sure it is available to local people who need them.
Policy 20	6		Land was sold very quickly - is it a done deal/insider information?
Policy 20	1		The allocations should enhance biodiversity and deliver net gains where possible in accordance with NPPF paras 9 and 109.

Policy 22 - Lyndhurst Park Hotel Comments

Policy / Paragraph	Broad no of responses	Summary of main points raised
Policy 22 - Lyndhurst Park Hotel	36 comments	<i>The majority of comments on Policy 22 raised objections and many of these were based on the proposals for the site from Pegasus rather than the wording of Policy 22. There was strong support for retaining part of the existing building and providing affordable housing for local people. Detailed comments included:</i>
		Southern Water must be consulted as the sewerage undertaker to ensure the foul water arising from the development can be accommodated. Upgrades should be factored into the costs and timescales for the development.
		Housing development of circa 700 dwellings in the whole of the Park would produce an additional demand of 30 primary pupils per year group across the Park. This would need to be considered alongside planned development in the wider New Forest area. Consolidating the provision of new housing development to create opportunities to expand existing schools would provide the best possible opportunity to create additional school places.
		Concerns over proposed retail use on the site given existing vacancy rates in the High Street.
		Adequate on-site parking must be provided as part of the development.
		Support for the provision of community facilities and the retention of the hotel as per the existing Core Strategy policies. If this is not viable it is important that the proportion of affordable housing on the site is maximised and the site is not lost to retirement living for people from outside the area.
		The over 60s population of Lyndhurst has increased because so much elderly accommodation has been built recently. That is not a justification for allowing more housing for the elderly.
		Consideration must be given to transport infrastructure and the ongoing congestion and pollution problems. A new development of some 90 properties will increase traffic volumes and cause parking issues. Policy 22 should require a detailed Transport Assessment to inform the redevelopment proposals.
		The NPA has failed to acknowledge the importance of the site as a heritage asset that should be listed.
		The original architectural features should be restored and retained and it would be prudent of the NPA to instruct an historic surveyor to undertake an independent review of the original building.
Paragraph 7.26	2 comments	Including a row of street-fronting buildings on the Lyndhurst Park Hotel site would exacerbate pollution in the High Street.
		The Parish Council is looking to implement a 'Green Streets Initiative' to reduce pollution in the village. This involves tree planting and should be factored into proposals for the site.

Policy 23 - Church Lane, Sway Comments

Policy / Paragraph	Broad no of responses	Summary of main points raised
Paragraph 7.27 - 7.30 and policy 23 (Church Lane, Sway)	120 comments	<i>The majority of representations (75%) regarding Church Lane, Sway raised objections, although around 10% of responses supported the proposals and 15% made comments. Responses included:</i>
		Sway is a well-appointed village with a main line railway station and good links to larger service centres. It is right that the settlement is assessed as a potential location for housing development.
		Consideration should be given to a roundabout in Durnstown - Birchy Hill - Church Lane area to improve traffic flow.
		Southern Water should be consulted as the sewerage undertaker for the area to ensure the foul water arising from the proposed development 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 costs and timescales for the development. .
		Housing development of circa 700 dwellings would produce an additional demand of 30 primary pupils per year group across the whole of the Park. Consolidating the provision of new housing development to create opportunities to expand existing schools would provide the best possible opportunity to create additional school places.
		The large greenfield site in Sway should not be allocated until a review of potential brownfield sites has been completed.
		The Church Lane site is in close proximity to designated nature conservation sites (international and national). This will need to be considered when formulating development specifications later on in the plan making process. The allocation should enhance biodiversity, and deliver net gains where possible, in accordance with NPPF paragraphs 9 and 109.
		The National Park designation should be sufficient to protect the fields from housing. 90 houses are too many for the small village of Sway, which does not have many community facilities and services. The proposal is contrary to the Village Design Statement which identifies important views.
		There should be mix of property sizes on this development - i.e. 2 / 3 / 4 bed houses.
		The policy should include a wider study of the needs of Sway, to include the train station, local buses, local community open space, community buildings & local retail & hospitality providers.
		Concerns about the proposed development include (i) lack of infrastructure; (ii) congestion in village; and (iii) where did the proposed extension of Jubilee Fields come from? This allocation is being driven by national Government housebuilding targets rather than taking on the real concerns of local people.
In 2010 the NFNPA rejected the site as unsuitable and since that time the NPA have adopted the Sway VDS. The increased pressures to build more houses are recognised but this site remains unsuitable. The site allocation would increase the footprint of the village by 7% - a significant expansion. Development would be contrary to the Park purposes and would result in a loss of open space. Any open space created should be for informal open space.		

		<p>This site should have been rejected as it borders a SSSI. The village boundary should remain in place. The capacity of Church Lane in highway terms is reached and there is no clear acceptable proposal to accommodate further traffic. The allocation disregards the VDS, and conflicts with the Park purposes. Other sites are available, and the need in Sway is no greater than anywhere else in the NP. Can the validity of the housing needs survey be demonstrated? The NPA should relax some of the site assessment criteria e.g. proximity to services, to ensure more suitable sites come forward.</p>
		<p>There are many more suitable housing sites within 5 miles of Sway & the NPA should be looking to NFDC to provide more housing on land less constrained by various designations outside the Park.</p>
		<p>Main problem is parking due to school in Westbeams Road. It would be helpful if a large car park were incorporated into the scheme to help alleviate these problems. The great need for affordable housing for local young people & older ones wishing to downsize is acknowledged. The site should be developed with a large proportion of 1 or 2 bed houses.</p>
		<p>The site in Church Lane is available and is the most appropriate. Sway needs affordable housing to balance the increasing numbers of wealthy incomers.</p>
		<p>Object to the proposed density of the allocation. Recent developments in Sway at a similar density of 36 and 38 homes per hectare look crowded. Would prefer lower density development of around 25dph.</p>
		<p>The Church Lane site is a good site for housing. Development could present problems for the numbers applying for St Luke's school, but development could also help with parking problems associated with the school. Important to keep the trees and hedges along the boundary with Birchy Hill.</p>
		<p>If the site does remain allocated the following restrictions should be put in place: (i) the part of the site within 400m of the New Forest SPA should not be developed; (ii) the housing needs of the village must be met by limiting dwelling sizes and adopting a local connection policy; (iii) a planted buffer zone of at least 10 metres should be created along the edge of the B3055 and Church Lane. (iv) Any open space that is created should be for informal open space.</p>
		<p>90 dwellings would change the village dramatically. Instead there should be a more sympathetic development. 40 dwellings would be more appropriate for the village. No objection to building in this area, just the number of homes.</p>
		<p>Concern that there is no control over the sale of houses and many will go to retired people or as holiday homes. If 90 houses are built now what is to stop 90 being built next year somewhere else on the edge of Sway?</p>
		<p>Thoroughly approve of building at Church Lane given the local need. Would like to see at least 50% of the dwellings be for rent like the old Council houses; and there must be controls over who buys the homes.</p>
		<p>The site is well related to the existing settlement which provides within walking distance a good range of community and social facilities, including a main line railway station. The site's boundaries are well screened with mature trees and hedgerows. The landscape and scenic beauty of the National Park would not be adversely impacted. Accordingly, the prospective allocation is supported although there is yet no basis to limit the capacity of the site to 90 dwellings.</p>

		Draft policy 23 allocates a grossly disproportionate share of the total proposed development in the National Park to one site in one village.
		Support building of affordable housing as it is much needed for young, single people and elderly. It would improve Sway. Also, could provide an area for parking for school which would help to alleviate problems on Church Lane.
		Fully support the principle of additional "affordable" housing for young families in Sway, but it is impossible to support the specific project at this stage as important questions of policy and infrastructure need to be clarified first.
		Consideration should be given to re-locating the existing school onto the Church Lane site and then building the housing on the school site which is closer to local facilities. This would enable traffic to access the school site without impacting on Church Lane and Westbeams Road.

Policy 24: Land at The Yews, Cadnam

Policy / Paragraph	Broad no of responses	Summary of main points raised
Policy 24 - The 'Yews'	13 comments	<p>There are a number of concerns raised about the site and the allocation of housing and employment, including:</p> <p>a. The site is a very close to the designated New Forest SPA;</p> <p>b. The allocation should enhance biodiversity, and deliver net gains to biodiversity where possible, in accordance with NPPF paragraphs 9 and 109;</p> <p>c. The Yews is shown on the EA Flood Risk From Surface Water as being at 'High Risk', and, therefore, the downstream impact on Bartley will need to be considered as well as any mitigation on site; and a need to check that the foul water arising from the proposed developments can be accommodated</p> <p>d. that school places are more difficult to provide for in small housing developments in smaller settlements, and that access by walking or cycling to school will need to be considered;</p> <p>e. There is support for the allocation subject to the dwellings proposed meeting the locally acknowledged need in terms of type & the affordable housing element being available for rent in perpetuity;</p> <p>f. The Copythorne Housing Needs Survey 2014 highlights greater need for 1 & 2 bed properties, and so smaller houses than 100 m2 are needed.</p> <p>g. There are views calling for alternative sites to be considered in more sustainable locations.</p>

Policy 25: Land at Strawberry Fields, East Boldre

Policy / Paragraph	Broad no of responses	Summary of main points raised
Policy 25	4 comments	It will lead to urbanisation of the area - noise / light pollution / loss of tranquillity
Policy 25	3 comments	East Boldre is not sustainable as it has poor facilities & amenities
Policy 25	3 comments	Detailed comments from infrastructure providers on school places and connections to sewerage & water
Policy 25	3 comments	NPA need to consider alternative sites e.g. brownfield sites / why not Sweyns Lease? / those on the edges of the National Park that relate well to a settlement outside the National Park.
Policy 25	2 comments	Need to include additional wording in policy to give protection to heritage assets & nearby nature conservation designations & enhance biodiversity
Policy 25	2 comments	this site could accommodate all of the housing need for East Boldre - no need therefore for Gaza Avenue
Policy 25	2 comments	There is a disconnect between level of housing need in East Boldre & level of housing proposed.
Policy 25	2 comments	Loss of green field / back up grazing land
Policy 25	1 comment	The site conflicts with other policies in the draft Local Plan

Policy 26: Land at Gaza Avenue, East Boldre

Policy / Paragraph	Broad no of responses	Summary of main points raised
Policy 26	17 comments	East Boldre is not sustainable as it has poor facilities & amenities
Policy 26	15 comments	Loss of back up grazing land
Policy 26	13 comments	Will lead to urbanisation of the area - noise / light pollution / loss of tranquillity
Policy 26	10 comments	Loss of amenity for neighbouring properties - overlooking / loss of privacy
Policy 26	9 comments	The field is a haven for wildlife
Policy 26	9 comments	Traffic & parking issues
Policy 26	6 comments	There is a covenant restricting housing & ransom strip
Policy 26	6 comments	Need to consider alternative sites e.g. brownfield sites / why not Sweyns Lease? / those on the edges of the National Park that relate well to a settlement outside the National Park / urban areas outside the Park
Policy 26	5 comments	Too many houses proposed in proportion to size of village
Policy 26	5 comments	Possible impact on trees
Policy 26	4 comments	No need for housing here / in a National Park
Policy 26	3 comments	Disconnect between level & type of housing need in East Boldre & level of housing proposed.
Policy 26	3 comments	Clarify no of houses proposed - 12 or 16
Policy 26	3 comments	Field floods in bad weather / poor drainage
Policy 26	3 comments	Conflicts with various sections of the NPPF
Policy 26	2 comments	Site is in close proximity to nature conservation designations - potential impact
Policy 26	1 comment	Include additional wording on protection of heritage assets
Policy 26	1 comment	Strawberry Fields site could accommodate all of the housing need for East Boldre - no need therefore for Gaza Avenue
Policy 26	1 comment	Affordable housing not appropriate in a retirement area

Policy 33: Gypsies, Travellers and Travelling Showpeople

Policy / Paragraph	Broad no of responses	Summary of main points raised
Policy 33	7 comments	Environmental impact of proposed development on Landford Bog SSSI / SAC (in particular drainage issues)
Policy 33	6 comments	There are sufficient gypsy sites - no need for more sites in Landford
Policy 33 Alternative Option	3 comments	Support Policy 33 Alternative Option to respond on a site by site basis
Policy 33	2 comments	Support allocation of site
Policy 33	2 comments	Traffic issues as site is located on a busy road
Policy 33	2 comments	NFDC have identified sufficient sites
Policy 33	2 comments	An additional plot is contrary to the existing planning permission
Policy 33	1 comment	The draft Plan does not meet the accommodation needs of gypsies, travellers & travelling showpeople
Policy 33	1 comment	Loss of open space
Policy 33	1 comment	Impact on birds on site & surroundings
Policy 33	1 comment	possible archaeological interest in the area
Policy 33	1 comment	Will lead to encroachment of the site onto Hamptworth & Landford Commons
Policy 33	1 comment	Not appropriate use in National Parks

Chapter 8: Economy

Policy / Paragraph	Broad no. of responses (Total 98)	Overarching point	Summary of main points raised
General Comments	6	General support but a couple of specific concerns	Responses: 4 responses gave general support, and 2 comments, which raised concern about the bias against conversion of existing buildings to storage and warehouse, and change of use of barns, greenhouses and other large scale buildings.
Policy 41 and accompanying text	8	Overall support but some concerns about broadband and the 'small scale' size limit.	Responses: 4 responses supported, 3 objections and 1 comment. In addition to a good level of support for this Policy, there were comments that 'small scale' should be defined, with some thinking this should be more restrictive and others that it should not limit development. There is support for delivering better broadband, as some think speeds are too slow.
Policy 42 and accompanying text	5	Mixed views - support, but some concerns.	<p>Comments and Suggestions: There were a range of detailed comments. There is support, but main concerns raised were:</p> <p>a. where the site does not add to sustainability, housing might be considered if it can be secured for a local occupancy.</p> <p>b. It does not provide sufficient flexibility to enable public bodies to make best use of their surplus land,</p> <p>c. The policy lacks any flexibility to consider alternative uses, including mixed uses (as encouraged by NPPF para 17) and the Policy currently compels an existing employment site to remain as such and this conflicts with NPPF para 22 and 51.</p> <p>d. Need to also consider B8 uses to support economic growth.</p>
Policy 43 and accompanying text	3	Low response level, with mixed views	<p>Comments and Suggestions: There were a range of detailed comments. There is support, but main concerns raised were:</p> <p>a. Any redevelopment should not have an adverse effect on the significance of any heritage assets.</p> <p>b. The policy lacks any flexibility to consider alternative uses, including mixed uses (as encouraged by NPPF para 17) and the Policy currently compels an existing employment site to remain as such and this conflicts with NPPF para 22 and 51.</p>
Policy 44 and accompanying text	3	Low response level, with mixed views	Comments and Suggestions: The comments are that this Policy is a little vague and 'limited extensions' needs defining. Concern that non-residential buildings could be converted into holiday lets and subsequently converted into new dwellings.

Policy 45 and accompanying text	13	Some support, but concerns raised about approach to major attractions, holiday lets, and policy's restrictions	<p>Responses: 3 Support, 3 Comments, 7 Objections. There is support, but main concerns raised were:</p> <p>a. Policy is not compliant with the NPPF as it restricts the location of tourism and only support small scale development;</p> <p>b. The policy restricts business expansion; and that new buildings outside of four defined villages where it does not have an adverse landscape or wildlife impact should allowed;</p> <p>c. There are a range of concerns about holiday lets, including that they will eventually become dwellings; that there should be greater control over the type of building that can be converted with the risk that many outbuildings and farm building will be lost; and that holiday cottages should not be allowed outside the four defined villages.</p> <p>d. There is concern about how Policy 45 treats major attractions within the NP - It is suggested that these should be explicitly acknowledged and a separate Policy is used for them. It is argued that there will be a need for larger and new developments at major attractions e.g. Paultons Park and Beaulieu Motor Museum.</p>
Policy 46 and accompanying text	19	Some support, but concerns raised about restrictive approach, lack of guidance on alternative forms of self catering, and not adhering to the Authority's economic 'duty'.	<p>Responses: 4 Support, 6 Comments, 9 Objections. There is some support, but main concerns raised were:</p> <p>a. There are many comments about the increase of 28 day pop up campsites, with some support for, and some objection to the concerns raised in the Plan. Some think they cause a detrimental impact, and that the loss of grazing land to campsites is a serious concern, whilst others want more of this affordable accommodation that provides income to farmers.</p> <p>b. As there is no flexibility to support proposals for holiday park developments that would benefit the local economy, the Policy is considered to be contrary to para.28 of the NPPG, and the 'duty' of the Authority. It is argued that Policy 46 should seek to manage pressures, rather than put up barriers against increasing demand</p> <p>c. The lack of policy guidance for alternative forms of self-catering accommodation is contrary to para.28 of the NPPF which clearly allows for sustainable rural tourism to be supported. Other National Park Authorities are more supportive of holiday parks and alternative forms of self-catering accommodation.</p>

			<p>d. There is concern that ancillary facilities for seasonal sites, such as hardstandings and toilet blocks, will not be viewed favourably as this does not show support for appropriate rural tourism.</p> <p>e. It is argued that there is no evidence of any assessment of the needs and opportunities for different types of visitor accommodation, and without this evidence the Policy cannot be considered a sound approach.</p> <p>f. A proposed change is that "In addition, <u>new</u> campsites may be acceptable within appropriate locations where established sites elsewhere in the NF have been lost".</p>
Policy 47 and accompanying text	9	A range of detailed comments & suggested wording changes.	<p>Responses: 3 Support, 4 Comments, 2 Objections. There are a range of detailed comments, with the main concerns being:</p> <p>a. Criteria b) needs to be expanded to provide clarity and include all the criteria for applications.</p> <p>b. It is argued the key to sustaining agriculture is the ability to carry out any development that makes the best financial return.</p>
Policy 48 and accompanying text	12	A range of detailed comments & suggested wording changes, with concerns that the policy is too restrictive.	<p>Responses: 1 Support, 3 Comments, 8 Objections. There is some support, and detailed comments, but main concerns were:</p> <p>a. The Policy needs to be clearer on what 'reuses' are acceptable.</p> <p>b. Holiday lets would be an appropriate use and would support the economy and should be included.</p> <p>c. The Policy does not conform with Para 51 or 55 of the NPPF as this states that LPAs should normally approve planning applications for changes to residential uses from commercial buildings where there is an identified need for additional housing.</p> <p>d. Does not conform with NPPF para 55 which allows the re-use of redundant or disused buildings in rural areas to residential.</p> <p>e. A final view is that Clauses are too restrictive and not clear enough</p>
Policy 49 and accompanying text	9	A range of detailed comments & suggested wording changes, with some concerns that the policy is too restrictive.	<p>Responses: 2 Support, 2 Comments, 5 Objections. There is some support for the Policy, but there are a range of concerns:</p> <p>a. ensuring that development for agriculture / forestry remains so in perpetuity;</p> <p>b. allow for the erection of new buildings for conservation and land management e.g. machine storage, estate offices etc.;</p> <p>c. Clause C is very restrictive; and need to clarify the term "large or obtrusive" in part (d) of the policy;</p>

			d. the accompanying text is unacceptable as it ignores a significant number of businesses who are not run by commoners.
Policy 50 and accompanying text	2	Low response level, with mixed views	There is support for the Policy, but specifically mentioning liveries and riding stables is requested.
Policy 51 and accompanying text	3	Low response level, with mixed views	There is some support but some concerns. It is noted that the Policy does not deal with mobile shelters that never move, and there are safety concerns about the fire hazards of building stables too close to houses.
Policy 52 and accompanying text	6	Low response level, with mixed views	There is a mix of views with a range of detailed comments. The main concerns are that maneges should be in suitable locations and should avoid grazing land; a planning condition be imposed that they are removed if they are no longer used; and there should be a review of the usage condition that is imposed on maneges.

CHAPTER 9: TRANSPORT & ACCESS

Policy / Paragraph	Broad no of responses	overarching point	Summary of main points raised
General	7 comments	Broad support for one or more policies	Support text & policies
			Support policy, especially criterion f)
			Support policy, especially criterion d)
General	7 comments	Concerns over increasing traffic & speeding & how the policies should address these issues	Install average speed cameras at entrance & exit points to the NP to help reduce traffic speeds & animal deaths
			NFDC will continue to work with NPA to better understand cumulative implications of growth proposals from both Local Plans
			Reduce speed limit
			Need to limit traffic
			Improve A road infrastructure to avoid short cuts by speeding motorists
			The Plan should include more text / policy on increasing levels of traffic (& noise / pollution etc.)
Parking Standards	5 comments	Views on parking standards	4 responses seeking to keep the parking standards in Annex 2
			1 response seeking to not retain the parking standards
General	4 comments	Implementation of policy	Transport policies appear vague & not enough information on how they will be implemented
			Need to add appropriate traffic management measures to this policy
			How will public rights of way be joined up?
Policy 53 & 54	4 comments	Concerns over impact of policies on environment / nature conservation interests	Add additional criterion to Policy 53- C) is aimed at protecting the environment of the National Park
			Policy 54 would encourage conflict with the Sandford principle & EU habitats regulations
			Improvements to access should only be made where appropriate & when impacts on nature conservation can be avoided or adequately mitigated
			Amend wording of criterion d) to include "to prohibit any invasion of designated tranquil areas"

Policy 53 & 54	6 comments	Need explicit support for cycling and associated infrastructure	Policy lacks support for electric vehicles and support for cycling infrastructure as means of achieving modal shift away from car
			Support measures that encourage sustainable transport alternatives e.g. adequate cycle parking
			Should explicitly address need for utility walking & cycling routes to local services / workplaces
			Criterion d) should include opening up all forest tracks for use by cyclists
			Include cycle routes alongside highway between Brockenhurst & Lymington, and Lyndhurst & Brockenhurst
Policy 53	3 comments	Policy 53 detailed specific comments & wording changes	Concerns that this policy may lead to other A and B roads becoming busier in order to address congestion on A31
			The order of criteria should be reversed
Policy 54	7 comments	Policy 54 detailed specific comments & wording changes	Amend wording of Policy 54 criterion d) - replace transport with journeys
			Include safe provision for horse riders in any development adjacent the carriageway.
			Create safer crossing of A roads
			No need for new rights of way
			Consider services to smaller settlements e.g. minibus
			Review use & capacity of car parks
			Include specific reference in Policy 54 to the England Coast Path
General	4 comments	Miscell comments	Ensure traffic data is up to date and still applicable to proposed policies
			Factual correction - Beaulieu Rd is not really a railway station, & Sway has no proper bus service
			Query - Why does the New Forest Tour not serve Sway?
			Include a reference to HCC's emerging guidelines on local distinctiveness covering road signage / road markings & road furniture

Alternative development sites suggested by respondents

Policy / Paragraph	Broad no of responses	Summary of main points raised
Alternative housing site	1 comment	Land to NE of Pennywell Gardens, Ashley, New Milton
Alternative housing site	1 comment	Land to N of Bournemouth Rd, Lyndhurst, adjacent to Notherwood Park
Alternative housing site	1 comment	Site at Ashurst Bridge
Alternative housing site	1 comment	Site at Foxhills, Ashurst
Alternative housing site	1 comment	Site south of Ashurst
Alternative housing site	1 comment	Land adjacent to Vine Cottage, Southampton Rd, Hythe
Alternative housing site	1 comment	Land to rear of Jubilee Court / Hollies Close, Sway
Alternative housing site	1 comment	Build housing on employment sites in Pitmore Lane, Sway
Alternative housing site	1 comment	Clayhill site, Lyndhurst (wider area of site already assessed)
Alternative housing site	1 comment	Vernalls Farm, Lyndhurst
Alternative housing site	1 comment	Land at Tile Barn Farm, Brockenhurst
Alternative housing site	1 comment	Land to rear of 229 Woodlands Rd
Alternative housing site	1 comment	Site of Oak Cottage, 50 Ramley Rd, Pennington
Alternative housing site	1 comment	Land off Ramley Rd, Pennington
Alternative employment site	1 comment	Forest Corner Farm, Hangersley (re-use of existing buildings)
Alternative gypsy site	2 comments	Land near junction of A31 & A36, Ower

Sites already assessed & rejected but resubmitted by agents / landowner		Bashley Sawmill (Site 32)
		Land North of Burnt House Lane, Bransgore (Site 20)
		Land to rear of Swiss Cottage, Lyndhurst (Site 127)
		New Forest Activity Centre (Site 28)
		Playing fields at Bartley (Site 122)
		Land to rear of Southampton Rd, Cadnam (Site 80)

Comments on supporting documents:

Policy / Paragraph	Broad no of responses	Overarching point	Summary of main points raised
Call for Sites Site No. 8 Land adjacent to 'Hartings', Rhinefield Road, Brockenhurst	23	Strong opposition to the site being classed as having "development potential"	There is considerable opposition to the assessment of this site and only one comment that supports the development of the site. The main objections include:
			a. The site has an existing S106 agreement in place requiring it to be kept as open space
			b. Protection for this land goes back to the NFDC "Forest and Downlands Villages Local Plan" and as now designated as a National Park it should not lose this protection;
			c. there should be no loss of existing open space;
			d. A planning appeal in 2012 to change this status was dismissed by the planning inspector;
			e. The access points to the land are unsuitable.
			The one response in favour of developing this site believes that the only reason the site was not allocated was due to the S106 agreement, and the site currently fulfils no legitimate planning function.
Call for Sites	5	Comments about a range of proposed sites	There was support and objections for a range of sites that were proposed (and their assessments) as part of the 'Call for Sites'.
Duty to Co-operate	1		The interim Duty to Cooperate Statement (Oct 2016) is agreed to be a fair reflection of cooperative working to date.
Housing Topic Paper	8	A range of detailed comments, mostly about individual sites.	A range of comments were received including:
			a. that insufficient checks were undertaken at Stage 1 Site Assessment to identify misrepresentations made by landowner / agent, contrary to NPPG e.g. covenant & ransom strips; Stage 1 and stage 2 Sites Assessments have been merged incorrectly;
			b. Disagreement with the principle of Call for Sites process - land in a National Park should be protected;
			c. The loss of existing open space should not be allowed;
			d. One respondent gave various comments on a number of alternative sites than the site allocated at Sway.
			e. The railway sidings in Brockenhurst were suggested for employment use to allow the former Redmayne site to be used for housing

Recreation Management Strategy	1		The reference to the Recreation Management Strategy throughout the Plan, and continuing progress of this strategy, is welcomed.
Sustainability Appraisal	4	Low response level, with a range of views	a. It is argued that allocations would need to provide mitigation for landscape and biodiversity impacts. It would help to refer to paragraph 109 of the NPPF when establishing specifications for the allocations.
			b. The Sustainability Appraisal does not test any additional alternative housing scenarios and the NPA cannot therefore know whether further housing can be accommodated because this scenario has not been tested - a fundamental failing. Secondly the SA does not set out any consideration of alternative options of any kind, and this contravenes the NPPF.
			c. It is suggested that The Port of Southampton Master Plan, the Southampton City Council Core Strategy, and the National Policy Statement for Ports (NPSfP) should be included as plans and programmes of relevance to the Sustainability Appraisal.
			d. Indicators should highlight what sustainable development looks like and proposals should be assessed against these.