



## **Consultation Statement**

### **New Forest National Park Local Plan 2016 - 2036 May 2018**

#### **1. Introduction**

- 1.1 The New Forest National Park Authority is undertaking a review of the local planning policies covering the National Park – currently contained within the Core Strategy & Development Management Policies DPD (adopted December 2010). This review is in response to changes in national policy and the experiences of applying the adopted planning policies for the past 7 years. The review will result in the production of a revised Local Plan covering the whole of the National Park.
- 1.2 The revised Local Plan will form a key part of the statutory ‘development plan’ for the National Park and will ultimately guide decisions on planning applications submitted within the Park. The Local Plan will set out how the planning system can contribute towards the vision for the New Forest National Park in 2036 and will include detailed planning policies and allocations that seek to deliver the two statutory National Park purposes and related socio-economic duty.
- 1.3 This Statement is a record of the consultation undertaken during the Local Plan-making process which started in 2015. As required by Regulation 22 of the Town and Country (Local Planning) (England) Regulations 2012, it sets out who has been invited to make representations on the Local Plan; summarises the main issues raised; and how they have been taken into account during the development of the Plan. The Statement covers the Regulation 18 consultation on the scope and main issues to be covered in the Local Plan review; the public consultation on the non-statutory draft Local Plan published in October 2016; the subsequent consultation on potential alternative housing sites undertaken in June – July 2017; and finally the statutory 6-week public consultation on the proposed Submission draft Local Plan in January and February 2018 (Regulation 19). The Statement also reflects the requirements of the Authority’s Statement of Community Involvement (2013).

#### **2. Purpose of the Local Plan**

- 2.1 Throughout its recent reforms, the Government has reaffirmed the importance of having an up to date Local Plan in place that conforms to national policy. National policy indicates that local plans are likely to require reviewing every five years or so. The Authority’s Core Strategy was adopted in December 2010 and therefore now is an opportune time to review the local planning policies covering the National Park.
- 2.2 The Government’s *National Parks Vision and Circular* (2010) recognises the importance of the planning system in the delivery of the two National Park purposes, and for this reason the Environment Act 1995 makes national park authorities the sole planning authorities for their areas. This covers development control, planning enforcement, minerals and waste planning and planning policy.

- 2.3 The National Planning Practice Guidance resource encourages the production of a single local plan for an area. The Authority has chosen to follow this advice and therefore the revised Local Plan will, once adopted, replace in full the existing Core Strategy, ensuring the National Park is covered by an up to date planning framework.

### 3. Details of Consultation to Date

- 3.1 In June 2015 the Authority's Planning Development Control Committee (PDCC) approved, for the purposes of public consultation, an initial scoping paper on the review of the Local Plan. This represented Regulation 18 in the Government's planning regulations and marked the stage where the Authority: (i) notified relevant bodies that the review of the local plan was underway; and (ii) invited comments on the scope and main issues to be covered by the review. The Authority also launched a 'Call for Sites' exercise at the same time inviting interested parties to submit sites that they would like considered for development as part of the review.
- 3.2 Across the country, authorities undertake this initial Regulation 18 consultation on the scope and issues to be included in a local plan review in a variety of different ways. The Authority chose to commence this initial consultation through inviting responses to a 20-page scoping document on the review; as well as engagement through the New Forest Show and existing forums including the annual planning agents meeting, the Parish Council Quadrant meetings, and the New Forest Consultative Panel (made up of over 80 organisations and groups in the New Forest). The Regulation 18 consultation stage was undertaken in accordance with Policy SCI-1 in the Authority's adopted Statement of Community Involvement (2013).

#### (i) New Forest Show – July 2015

- 3.3 The annual three day New Forest Show is visited by tens of thousands of people and provided the Authority with the opportunity to engage with people who were perhaps less well represented by existing bodies and groups in the Forest.
- 3.4 Visitors to the Authority's stand over 28, 29 and 30 July 2015 were asked to identify their top 5 issues which they consider were important for the Local Plan to address. During these three days the Authority received over 1,200 individual responses, with the following issues identified as key topics for the Local Plan review.
- Ensuring the conservation and enhancement of the New Forest's nationally and internationally protected landscapes and habitats.
  - Addressing the needs for affordable housing for local people.
  - Assess if new or improved footpath and cycleways are required.
  - Ensuring the continued protection of the Forest's historic environment.
  - Addressing concerns regarding the scale and density of new development.



(ii) *Regulation 18 consultation on scope and main issues to be addressed*

- 3.4 The Authority published a Regulation 18 scoping paper for public consultation on 11 September 2015, running until 23 October 2015. In line with the Government's planning regulations and the commitments made in the Authority's Statement of Community Involvement (2013), copies of the consultation document were sent to all statutory and other relevant consultees and made available for inspection at the Authority's offices in Lymington. The consultation was also promoted extensively through the Authority's website, Facebook page, Twitter, local press and *Parklife* newspaper as well as posters on Parish Council noticeboards. In total over 130 statutory and general consultees were directly notified of the consultation (the full list can be viewed in Annex 1 to this statement) and regular updates on the launch of the review were also given at the Parish Quadrant meetings held in Autumn 2015.
- 3.5 During the 6 week public consultation, the Authority received detailed responses from 61 different organisations, groups and individuals. This included local town and parish councils, statutory consultees, neighbouring authorities, business groups and local residents. Set out below is a summary of the responses received during this Regulation 18 work and how they have been taken into account.

Area	Summary of main points raised at Regulation 18
<b>General Comments</b>	<ul style="list-style-type: none"> <li>Support for existing planning policies expressed by a range of consultees including a number of parish councils and the New Forest Association</li> <li>A number of the larger Estates in the New Forest called for further engagement as the Plan is developed.</li> <li>The New Forest Association and the National Trust stated that consideration should be given to the inter-dependence with areas surrounding the National Park, and to the National Park's setting.</li> <li>The Verderers queried whether an updated Habitats Regulations Assessment of the Local Plan was necessary.</li> </ul>
	NFNPA Response
	<ul style="list-style-type: none"> <li>The NPA is undertaking a review of the Local Plan, rather than a wholesale re-write, in recognition that many policies conform to the NPPF.</li> <li>The larger Estates were invited to a Local Plan workshop in Spring 2016.</li> <li>The areas surrounding the National Park are outside the direct scope of the Authority's Local Plan Review</li> <li>An updated HRA of the Plan is legally required.</li> </ul>

Area	Summary of main points raised at Regulation 18
<b>Conserving the natural environment</b>	<ul style="list-style-type: none"> <li>Natural England noted that the Local Plan should recognise that the Authority is already providing mitigation for the recreational impacts on the Solent &amp; Southampton Water SPA via the Solent Recreation Mitigation Partnership.</li> <li>New Forest District Council commented that the Authority will need to review its mitigation requirements if the scale of development increases.</li> <li>Concerns were raised over the impact of recreational horse keeping on commoning and traditional land management.</li> <li>The Environment Agency stated that specific reference to flood risk will be key within the plan and a sequential approach should be taken to the allocation of any development.</li> <li>The Country Land &amp; Business Association and National Farmers Union commented that policies should be positive towards renewable energy development which has an overall environmental benefit, where as a number of parish councils called for a stricter approach to renewable energy development.</li> </ul>

	<b>NFNPA Response</b> <ul style="list-style-type: none"> <li>▪ Reference to the NPA's work as part of the Solent Recreation Mitigation Project will be included.</li> <li>▪ Habitat mitigation measures will be included as part of the review.</li> <li>▪ A detailed flood risk assessment (SFRA) will be undertaken as part of the Local Plan review.</li> <li>▪ The local planning policy on renewable energy development within the National Park will be reviewed.</li> </ul>
<b>Area</b>	<b>Summary of main points raised at Regulation 18</b>
<b>Conserving the Built Environment</b>	<ul style="list-style-type: none"> <li>▪ Concerns raised by a number of parish councils regarding the visual impact of solar panels; and the impact of construction traffic on verges.</li> <li>▪ Minstead Parish Council called for additional guidance on basements.</li> <li>▪ Continued support for the protection of the distinct character of the New Forest villages by stopping large extensions &amp; replacement dwellings from Sway Parish Council and the New Forest Association.</li> <li>▪ The CLA response encouraged the re-use of existing buildings on brownfield sites e.g. underused farm buildings.</li> <li>▪ Sway Parish Council supported the continued protection of designated and non-designated heritage assets.</li> </ul>
	<b>NFNPA Response</b>
	<ul style="list-style-type: none"> <li>▪ Reference to protecting verges will be included in the revised Local Plan.</li> <li>▪ Detailed DC policies on residential extensions, replacement dwellings and the re-use of buildings will be included in the revised Local Plan.</li> </ul>

<b>Area</b>	<b>Summary of main points raised at Regulation 18</b>
<b>Vibrant Communities</b>	<ul style="list-style-type: none"> <li>▪ Call for the NPA to be proactive in providing a balance within the housing stock to meet local needs. Given the limited land that could be released within the Park suggest that for the next ten years new housing is restricted to two bedrooms.</li> <li>▪ The Cadland and Hinton Admiral Estates stated that policy support for new dwellings for retired estate workers would help to meet the needs for housing for older people.</li> <li>▪ Call for the NPA to implement a 'local occupancy clause' on all new dwellings to reduce their open market value.</li> <li>▪ Sway Parish Council supporting maintaining Sway as a 'defined village'.</li> <li>▪ The Keep Ashurst &amp; Colbury Green Group called for the defined village boundary of Ashurst to remain unaltered and for new development to be confined to the defined villages.</li> <li>▪ The Friends of Brockenhurst supported the existing approach of four defined villages. Brockenhurst Parish Council called for the existing village boundary to be retained.</li> <li>▪ There was a call for other larger villages including Landford, Cadnam, Burley and Beaulieu to accommodate new housing.</li> <li>▪ A range of comments were made on the Commoner's Dwelling Scheme, with the suggestion that greater restrictions should be placed on the scale of ancillary buildings.</li> <li>▪ While a number of parish councils supported the policy approach to replacement dwellings and extensions, a number of planning consultants responded stated that the policies should be completed reviewed to allow greater flexibility.</li> <li>▪ One response stated that the NPA should meet its responsibility and identify sites to meet identified gypsy and traveller needs.</li> </ul>

	<p style="text-align: center;"><b>NFNPA Response</b></p> <ul style="list-style-type: none"> <li>▪ Consideration will be given to supporting the provision of smaller units through local planning policies.</li> <li>▪ The revised Local Plan will retain a basic settlement hierarchy and the defined village boundaries will be reviewed as part of this.</li> <li>▪ The Local Plan review will also consider the allocation of sites within other settlements in the National Park.</li> <li>▪ The local planning policy approach to commoner's dwellings will be clarified in a stand-alone policy.</li> <li>▪ The Local Plan will retain detailed DC policies on replacement dwellings and extensions given the volume of applications received.</li> <li>▪ The Authority will look to positive allocate land to meet the identified need for gypsy and travellers.</li> </ul>
<b>Area</b>	<b>Summary of main points raised at Regulation 18</b>
<b>Local Economy</b>	<ul style="list-style-type: none"> <li>▪ The Local Enterprise Partnership and CLA stated that small and medium space for industry/business should be provided to allow enterprises to develop within the main villages, reducing commuting and retaining/creating jobs.</li> <li>▪ The LEP and CLA recognise the low unemployment in the Park, but questioned whether this disguises the amount of part time jobs, is the result of the diverse economy, and whether there is sufficient local labour for new lower income jobs.</li> <li>▪ A number of parish councils stated that current policies are not strong enough to avoid harmful environmental and cultural impacts; and the Sandford Principle should apply to tourism development.</li> <li>▪ Views were expressed that the shift from land based businesses to tourism is a serious problem that is harmful to the Forest's distinctive character, that farm diversification should not include large scale solar PV installations, and that change of land use procedures should be strengthened to protect agricultural and commoning land use.</li> <li>▪ The fact that many permitted development rights do not apply in National Parks was raised in relation to policies for agricultural development, and a call that the NPA exercises prior approval powers responsibly where PD rights are in place.</li> <li>▪ The fact that economic prosperity in the Park relies on the environment was raised, as was the view that with the economy thriving, the emphasis should be on the social rather than the economic well-being part of the Authority's 'duty'.</li> <li>▪ The potential for future port development at Dibden Bay was raised. It was suggested the Local Plan should identify this as a strategic issue and provide appropriate policy guidance for it.</li> <li>▪ A view was expressed that horse keeping makes a significant contribution to the local economy and the Forest's cultural heritage, and that there should be no major changes to existing planning policies.</li> <li>▪ Conversely alternative views were that the current policy on manages is not compatible with NPPF and needs to be reviewed, and that the rural landscape is in danger of being overwhelmed by paddock fencing and field shelters.</li> </ul>
	<b>NFNPA Response</b>
	<ul style="list-style-type: none"> <li>▪ The need for employment / business space will be included in the review.</li> <li>▪ The revised Local Plan will include reference to the Sandford Principle while recognising the positive role of the tourism sector to the local economy.</li> <li>▪ The revised Local Plan will clarify that the delivery of the two statutory Park purposes supports the socio-economic well-being of communities within the National Park.</li> <li>▪ The revised Local Plan will include guidance on the Dibden Bay site insofar as it relates to land within the National Park.</li> <li>▪ Detailed development control policies on recreational horse keeping will be retained within the revised Local Plan given the range of views expressed.</li> </ul>

Area	Summary of main points raised at Regulation 18
<b>Transport &amp; Access</b>	<ul style="list-style-type: none"> <li>▪ Ellingham, Harbridge &amp; Ibsley Parish Council called for planning policy support for sufficient off-street parking to reduce damage to protected verges in the National Park.</li> <li>▪ Several Parish Councils – including Hyde and Sway - were keen to explore traffic management measures such as traffic calming or Quiet Lanes Scheme to boost tranquillity.</li> <li>▪ Hampshire County Council called for reference to be made to the Hampshire and Wiltshire Countryside Access Plans, and the Hampshire Cycling Strategy in the Local Plan Review.</li> <li>▪ A number of local residents called for a Lyndhurst by-pass.</li> <li>▪ Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the strategic road network i.e. M27 and A31.</li> <li>▪ The CLA feels that the Local Plan should be used to shape trends in transport by encouraging more home-working and local services to reduce road use.</li> </ul>
	<b>NFNPA Response</b>
	<ul style="list-style-type: none"> <li>▪ In line with national planning policy, the need for the Local Plan to include local parking standards will be considered.</li> <li>▪ The Highways Agency (now Highways England) will be consulted on the draft Local Plan.</li> <li>▪ References to be included to the relevant Hampshire and Wiltshire Countryside Access Plans.</li> <li>▪ The revised Local Plan will support appropriate home working.</li> </ul>

(iii) *Follow up meetings – Spring 2016*

- 3.6 Following consideration of the consultation responses received during the Regulation 18 consultation, the Authority arranged a series of topic-based meetings with key groups to discuss the responses received and how the issues raised could be addressed through local planning policies. The decision to arrange the meetings was also made in response to a number of consultation comments which suggested round table meetings.
- 3.7 The Authority arranged a series of topic based meeting between March and May 2016 to input into the preparation of a draft Local Plan. Set out below are details of the meeting held in Spring 2016.

Title	Historic & Built Environment Workshop – March 2016
Attendees	Historic England & NPA specialist staff covering Development Control, Landscape, Archaeology, Building Design and Conservation.
Areas Covered	<ul style="list-style-type: none"><li>Historic England advised that existing planning policies may need strengthening and potentially amended to include specific guidance on listed buildings; historic parks &amp; gardens and landscape.</li><li>There was discussion around the benefits of having a policy on enabling development. As such development is generally an exception to policy it was agreed not to include a policy.</li><li>With regard to archaeology it was felt that a policy reference should be included to provide the necessary hook for various issues.</li><li>Historic England advised that the Local Plan should set out a clear positive strategy for the historic environment, and not just focus on reactive development control policies, but also set out the proactive things the NPA is doing to provide a positive approach to the enhancement of the historic environment.</li><li>There was also a brief discussion around the potential role for Estate-level plans in the New Forest, given the role of a small number of large Estates who manage a significant proportion of the Park outside the Crown Lands</li></ul>
Conclusions	It was agreed that the existing planning policies are broadly effective and do not require major amendments, but could benefit from one or two additional policies, with some additional criteria in existing policies. This would also be in line with the requirements of the NPPF to set out a clear positive strategy for the conservation and enhancement of the historic environment.

Title	Socio-Economic Workshop – March 2016
Attendees	Commoners Defence Association, New Forest Business Partnership, Federation of Small Businesses, New Forest District Council, Country Land & Business Association, New Forest Association, Forestry Commission, New Forest Tourism Association, Hampshire Chamber of Commerce, New Forest Marque and NFNPA staff
Areas Covered	<ul style="list-style-type: none"><li>It was generally agreed that no major change was required to the broad thrust of the existing business and economic policies.</li><li>No substantial concerns were raised about the effectiveness of existing policies and, indeed, some thought that existing policies for the land based economy and the visitor economy had been particularly effective since the Core Strategy was adopted.</li></ul>

	<ul style="list-style-type: none"> <li>▪ Given the number of small businesses in the National Park, the Local Plan review should consider the space needed for these businesses and their expansion, together with the trend for home working and start-ups.</li> <li>▪ The meeting felt that local planning policies should enable the consideration of the loss of an employment site in exceptional circumstances if there is an opportunity to deliver a more beneficial use for the National Park.</li> <li>▪ It was generally agreed that the existing policies for tourism development are effective and do not require much change.</li> <li>▪ The existing policy on the land based economy was supported. The attendees felt that some flexibility may be required for small scale developments associated with the expansion of local produce businesses and commoners.</li> </ul>
Conclusions	No major changes were considered necessary to the broad thrust of the existing business and economic policies. No substantial concerns were raised about the effectiveness of existing policies and, indeed, some thought that existing policies had been particularly effective. There were, however, a number of issues to be considered in the review of existing policies, including the shift to raising beef cattle by commoners, the need for both good broadband and mobile communication coverage, the lack of affordable housing, the increased mechanisation and declining number of workers on farm holdings, the pay of local jobs, and the vibrancy of village centres.

Title	<b>Neighbouring Authorities Duty to Cooperate Workshop – March 2016</b>
Attendees	Christchurch & East Dorset Councils, Hampshire County Council, New Forest District Council, Southampton City Council, Test Valley Borough Council, Wiltshire Council, & New Forest National Park Authority specialist staff
Areas Covered	<ul style="list-style-type: none"> <li>▪ Given the level of protection afforded to the landscape and habitats of the New Forest, the NPA confirmed that a significant step change upwards in the scale of housing delivery in line with the need identified in the SHMA is unlikely to be consistent with the two statutory National Park purposes.</li> <li>▪ The Objectively Assessed Housing Need figure for New Forest District Council is unlikely to be deliverable (even with a Green Belt review) and therefore NFDC will also be entering into dialogue with their neighbouring authorities regarding housing need.</li> <li>▪ Other local authorities faced similar challenges, including (i) tightly drawn administrative boundaries (Southampton); and (ii) protected habitats and Green Belt (Christchurch and East Dorset).</li> <li>▪ On the cross-boundary topic of habitat mitigation, it was clear that a variety of local approaches had been developed. It was agreed that there was a need for a more joined up approach to habitat mitigation, as the current approach was rather piecemeal and resulted in different approaches in different authorities.</li> <li>▪ The idea of a more formal 'Duty to Cooperate Protocol' or 'Memorandum of Understanding' was raised by the NPA. It was acknowledged that there was already a good degree of co-operation between the local authorities present, although this could perhaps be further strengthened between the Hampshire authorities and neighbouring areas of Dorset and Wiltshire.</li> </ul>
Conclusions	There are significant challenges in meeting the OAN figures identified for the various HMAs in the area. It was agreed that cross-boundary liaison and co-operation must continue, with a number of authorities unlikely to be able to accommodate the full scale of housing required due to a variety of constraints and designations. It was acknowledged that this may necessitate authorities making representations on each other's Local Plans as they develop.



	<p>It was agreed that habitat mitigation was a strategic cross-boundary issue that covered local planning authorities in Hampshire, Wiltshire and Dorset. To date the approach to mitigating impacts on the New Forest's Natura 2000 sites had developed in a piecemeal manner - with each planning authority working up their own locally based set of mitigation measures – and it was agreed that the NFNPA should look to co-ordinate this work, working with Natural England.</p> <p>Given the degree of liaison and cooperation that already exists, it was agreed that a more formal protocol or Memorandum of Understanding was not necessary but that existing links should be strengthened to ensure cooperation on cross-boundary issues.</p>
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Title	<b>New Forest Estates Workshop - May 2016</b>
Attendees	Cadland Estate, Bisterne Estate, Somerley Estate, Pylewell Estate, Sowley Estate, Country Land & Business Association, Exbury Estate, Hamptworth Estate, Beaulieu Estate, Hinton Admiral Estate and NPA officers.
Areas Covered	<ul style="list-style-type: none"> <li>▪ The general consensus of the Estates is that the existing, narrow definition of an 'agricultural worker' needed to be broadened to reflect modern practices and the diversity of Estate workers roles.</li> <li>▪ On some Estates there is a significant stock of redundant agricultural buildings that could be put to more viable uses, including the provision of housing for local people.</li> <li>▪ A number of Estates emphasised that it would be helpful if any new planning policy could be 'locationally flexible' to allow new build for Estate workers where there was a particular functional need, rather than just focused on conversions.</li> <li>▪ There was a discussion around the merits of 'Estate Plans' which seek to recognise the important role the larger Estates play in the National Park and enables the NPA to be aware of how individual development proposals fit within the bigger picture.</li> <li>▪ There was a general recognition of the positive role Estate Plans can play in providing the evidence and justification for development proposals. Ultimately the Estates and the NPA have a shared interest in ensuring the Estates remain economically viable and holdings are not fragmented and Estate Plans could play a role in ensuring this.</li> </ul>
Conclusions	<p>It was acknowledged that Estate workers are increasingly employed in non-agricultural work and their needs are not therefore always catered for in local planning policies. The Estates have established criteria for people looking to rent Estate housing and it was agreed that this would be shared with the NPA.</p> <p>It was agreed that the NPA would circulate an outline of what they would expect to see in an Estate Plan and to provide an indication of the mechanism by which the Estate Plans would be agreed / endorsed.</p>

Title	<b>New Forest Defined Villages Meeting - June 2016</b>
Attendees	Ashurst & Colbury Parish Council, Brockenhurst Parish Council, Lyndhurst Parish Council, Sway Parish Council and NPA officers.
Areas Covered	<ul style="list-style-type: none"> <li>▪ Part of the Local Plan Review has included an assessment of the defined village boundaries. These boundaries date back to the 1980s and 1990s and have not been reviewed since they were first created.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Each of the village boundaries were discussed, including (i) the only real scope to identify sites around Ashurst being either the hospital site to the south west, or land to the north east of the village; (ii) the heavily constrained land around Brockenhurst; (iii) the submission received during the Reg. 18 consultation to amend the Lyndhurst defined village boundary to include the Lyndhurst Park Hotel site; and (iv) the submission received during the 'Call for Sites' process regarding land south of Church Lane in Sway for a greenfield development comprising residential and open space.</li> <li>▪ It was suggested that the NFNPA should considered reviewing local planning policies to encourage the development of smaller dwellings to meet the identified local housing need in the Forest.</li> <li>▪ A number of Parish Councils felt that the emphasis on 'subservient extensions' set out in the Design Guide SPD was being lost. The pros and cons of extending the '30% rule' to include dwellings within the defined villages were debated, with no firm view reached.</li> <li>▪ A number of parish councils felt that Policy DP12 was being used to side-step the restrictions placed on residential extensions</li> </ul>
Conclusions	<p>There was a general acknowledgement of the need for the four defined village boundaries to be reviewed. There was also a consensus that any suitable sites that are identified adjoining the defined villages should be brought forward through specific allocations rather than amendments to the boundary.</p> <p>The Parish Councils called for the NFNPA to consider allocations in other settlements elsewhere in the National Park as part of the Local Plan Review.</p> <p>The Parish Councils were also generally supportive of the NPA introducing CIL in parallel with the review of the Local Plan, which could financially incentivise the development of smaller dwellings and affordable housing.</p> <p>The consensus was that the current Core Strategy had performed well, but that recent changes in national Permitted Development Rights and the development pressures on the National Park meant that the detailed policies relating to residential extensions, replacement dwellings, outbuildings and changes of use should be considered as part of the review.</p>

*(iv) Consultation on non-statutory draft Local Plan – October 2016*

- 3.8 Following the conclusion of the meetings in Spring 2016, the Authority prepared a consultation draft Local Plan. Although there is no legal requirement to do so within the Government's Planning Regulations (and no commitment within the Authority's adopted Statement of Community Involvement), the decision was taken to publish a detailed, non-statutory draft Local Plan for a period of public consultation in Autumn 2016. This would allow people to comment on the draft Plan and the emerging proposals to inform the preparation of the Submission draft Local Plan in 2017.
- 3.9 The consultation draft Local Plan was approved for the purposes of public consultation at the full Authority meeting on 22 September 2016. Notification of the 8-week public consultation on the draft Plan was sent to all consultees notified of the Regulation 18 consultation, as well as everyone who responded to the Regulation 18 consultation and the 'Call for Sites' process. A presentation on the draft Local Plan was given to the New Forest Consultative Panel in early September 2016; the Authority's annual Planning Agent's meeting on 28 September 2016, and the regular Parish Quadrant meetings held in September – October 2016.

- 3.10 Alongside the draft Local Plan, the Authority published a range of supporting documents including background evidence base studies, topic papers and related appraisals / assessments.
- 3.11 As part of this public consultation, four public drop-in sessions were held between 18 October and 9 November 2016, one in each of the geographic quadrants of the National Park (Lyndhurst, Minstead, Sway and Godshill, see photos below). In total over 800 people attended the drop-in sessions, which were held between 2pm and 7.30pm at each of the venues.



Photos from the public drop-in events (Sway, left and Godshill, right) held in October and November 2016 on the non-statutory consultation draft New Forest National Park Local Plan Review 2016 - 2036

- 3.12 Set out in the following tables is a summary of the main points raised during the public consultation on the draft Local Plan; and how the feedback received was used to inform the Submission draft Local Plan. A detailed 43-page summary of the consultation comments received was made available on the Authority's website in February 2017. In total consultation responses were received from 384 individuals and organisations, many of which made multiple comments. Statutory consultees who responded included the Environment Agency, Hampshire County Council, Historic England, Natural England, New Forest District Council, Southampton City Council and Test Valley Borough Council; as well as 20 of the town and parish councils within the National Park.

Area	Summary of main points raised on the consultation draft Local Plan (2016)
General Comments	<ul style="list-style-type: none"> <li>▪ Objections to any house building in the National Park.</li> <li>▪ The Plan fails to meet the needs of older people in the National Park. It needs to acknowledge and address the ageing population.</li> <li>▪ It is unclear what infrastructure is required to support the proposals in the Plan.</li> <li>▪ A policy that helps households who might wish to downsize should be included.</li> </ul>
	<p><b>How the comments received have informed the Submission draft Local Plan</b></p> <ul style="list-style-type: none"> <li>▪ National planning policy supports small scale development in National Parks to meet local needs.</li> <li>▪ The Submission draft Local Plan includes a new section and policy on addressing the needs of an ageing population within the National Park.</li> <li>▪ The revised draft Local Plan is accompanied by an Infrastructure Delivery Plan.</li> <li>▪ The Submission draft Local Plan supports the provision of smaller dwellings, which will help provide a stock of dwellings for people looking to downsize.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Executive Summary and Chapter 1 Introduction</b>	<ul style="list-style-type: none"> <li>▪ The Executive Summary notes the major recent changes in the planning system but ignores the changes in housing policy. There needs to be an acknowledgement that greenfield housing sites will be required in the Park.</li> <li>▪ The Authority should demonstrate how its historic environment evidence base has informed and influenced the Plan's policies.</li> <li>▪ 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 an undue emphasis is placed on the socio-economic duty.</li> </ul>
	How the comments received have informed the Submission draft Local Plan
	<ul style="list-style-type: none"> <li>▪ The Submission draft Local Plan acknowledges the local housing need and proposes a number of greenfield allocations to meet some of the need.</li> <li>▪ Chapter 6 (the Historic and Built Environment) has been updated to make wider reference to the work of the Authority on conserving the historic environment.</li> <li>▪ The Submission draft Local Plan sets out how each of the Plan objectives relate to the statutory Park purposes and related socio-economic duty.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 2 Profile of the Park</b>	<ul style="list-style-type: none"> <li>▪ The NPA appears to have no strategic policy which addresses day visitors &amp; impact on the National Park.</li> <li>▪ 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.</li> <li>▪ Additional wording should be added recognising the impacts of light aircraft.</li> <li>▪ 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.</li> </ul>
	How the comments received have informed the Submission draft Local Plan
	<ul style="list-style-type: none"> <li>▪ The update of the New Forest National Park Recreation Management Strategy (RMS) is the appropriate avenue for addressing recreational pressures.</li> <li>▪ Larger settlements surrounding the National Park (e.g. Ringwood, Lymington) were excluded from the Park boundary by the Government in 2005 and their extension into the nationally designated landscape would need robust justification.</li> <li>▪ Light aircraft do have an impact on people's enjoyment of the Park and its special qualities, but the planning system cannot restrict overflying.</li> <li>▪ Reference to the national policy position in terms of major port development has been updated in the Submission draft Local Plan.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 3 Vision and Objectives</b>	<ul style="list-style-type: none"> <li>▪ It will be vital that the NPA has a strategy in place for ensuring that the visitors from new developments do not have a detrimental impact on protected habitats.</li> <li>▪ Reference should be made to the delivery of housing within the Park - the context for which is established within the Government's National Parks Circular (2010).</li> <li>▪ The objectives make it look as though the first purpose has greater importance than the second purposes, even though they are of equal importance.</li> <li>▪ Suggestion for an additional strategic objective recognising the need to ensure that development planned outside the Park provides mitigation measures.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ 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 "sufficient level of housing to meet local needs."</li> <li>▪ 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.</li> <li>▪ The Vision should be amended to reflect a more proactive approach to delivering housing within the National Park and do more to meet local needs. The reference to 'small scale housing development' in the Vision is inappropriate.</li> <li>▪ The statutory purposes do not provide for the 'delivery of sustainable development' - its statutory duty is only to 'foster'.</li> </ul>
	<b>How the comments received have informed the Submission draft Local Plan</b>
	<ul style="list-style-type: none"> <li>▪ The update of the New Forest National Park Recreation Management Strategy (RMS) is the appropriate avenue for addressing recreational pressures.</li> <li>▪ The Submission draft Local Plan cross-refers to the relevant sections in the Government's National Parks Circular, which is itself referenced within the NPPF.</li> <li>▪ There is no prioritisation of the purposes in the Local Plan and reference is made within policy SP1 to the weight attributed to the purposes.</li> <li>▪ The NPA's Submission draft Local Plan cannot provide policy coverage for areas outside the Park, but the NPA is liaising with neighbouring policy authorities on this.</li> <li>▪ The NPPF acknowledges that National Parks area areas where development should be restricted and the wording in the Vision is considered to reflect this.</li> <li>▪ The Submission draft Local Plan is required to look 15 years ahead and the Vision is considered to therefore be appropriate.</li> <li>▪ National planning policy confirms that major development should only be permitted in the Park in exceptional circumstances. The emphasis on 'small scale development' in the Vision is therefore considered to accord with national policy.</li> <li>▪ The NPPF places sustainable development at the centre of the planning system and the NPA Submission draft Local Plan reflects this through policy SP1.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 4 Strategic Policies</b>	<ul style="list-style-type: none"> <li>▪ Policy 1: Sustainable Development: A range of views were expressed on the draft policy. Detailed comments include an objection to the reference to the Sandford Principle; comments that the Plan should be much clearer in setting out a presumption against development within the National Park; and conversely that the policy has not been prepared in a positive manner as required by the NPPF.</li> <li>▪ Policy 2: Major Development: General support for the inclusion of a policy on major development in the National Park. Detailed comments include the view that the Local Plan should provide coverage on how major development proposals that come forward outside the Park and will affect it will be dealt with; and comments that 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.</li> <li>▪ The recognition of the Fawley Power Station site was welcomed by some. Given its significance, respondents considered it 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.</li> <li>▪ 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 &amp; Country Planning Act 1990.</li> <li>▪ The indication in the emerging plan of the factors the NFNPA considers need to be taken into account for the Dibden Bay site was welcomed.</li> <li>▪ Spatial Strategy: Calls for consideration to be given to a review of the Defined Villages settlement boundaries; and representations highlighting that 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.</li> </ul>

	<b>How the comments received have informed the Submission draft Local Plan</b> <ul style="list-style-type: none"> <li>Reference to the Sandford Principle and the Environment Act 1995 has been amended in the Submission draft Local Plan.</li> <li>Policy SP3 has been amended to remove reference to 'overriding' public interest, ensuring it reflects national policy in paragraph 116 of the NPPF.</li> <li>Significant joint working has taken place throughout 2017 between the NPA and New Forest District Council on the redevelopment of the former Fawley Power Station site.</li> <li>References to the planning status of the Dibden Bay site have been updated in the Submission draft Local Plan.</li> <li>The defined village boundaries have been reviewed. The NPA has considered the principle of neighbouring settlements extending into the National Park, but continues to have significant reservations regarding how such development would meet the needs of communities living <u>within</u> the National Park.</li> </ul>
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Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 5 Protecting and Enhancing the Natural Environment</b>	<ul style="list-style-type: none"> <li>Support for the protection measures for the New Forest SPA to remain in place, as well as some concern that current mitigation measures are insufficient.</li> <li>A call for greater protection for the SSSI verges of the New Forest</li> <li>A mix of views were expressed on the principle of new SANG provision within the Park, alongside calls for greater clarity on SANG criteria.</li> </ul>
	<b>How the comments received have informed the Submission draft Local Plan</b> <ul style="list-style-type: none"> <li>The Submission draft Local Plan has been subject to a detailed HRA to ensure the integrity of the Natura 2000 sites in the National Park is not affected. The NPA's Habitat Mitigation Scheme has been reviewed in parallel with the Local Plan.</li> <li>Additional reference to the need to protect SSSI verges has been included and this supplements the work being done in the Western Escarpment Conservation Area and through measures funded by the New Forest HLS scheme.</li> <li>Additional wording has been added to the Submission draft Local Plan on the criteria for new SANG provision in the National Park.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 6 Protecting and Enhancing the Historic &amp; Built Environment</b>	<ul style="list-style-type: none"> <li>Broad support for the draft policies seeking to conserve local distinctiveness.</li> <li>Representations stating that the Local Plan should be more proactive in supporting the conservation &amp; enhancement of the historic environment.</li> <li>A call to require more supporting information so applicants can demonstrate how they have had due regard to the enhancement of the built environment.</li> </ul>
	<b>How the comments received have informed the Submission draft Local Plan</b> <ul style="list-style-type: none"> <li>The Submission draft Local Plan places a strong emphasis on the local distinctiveness of the built environment of the New Forest.</li> <li>Additional wording has been included in Chapter 6 of the Submission draft Local Plan outlining the range of methods through which the NPA is supporting the conservation of the built environment.</li> <li>Additional wording has been added to the Submission draft Local Plan setting out the information required from applicants when submitting applications that may affect the built environment of the National Park.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
Chapter 7 Vibrant Communities	<ul style="list-style-type: none"> <li>▪ The SHMA (2014) does not take into account the Government's latest household projections and should be updated.</li> <li>▪ Under the duty to cooperate there is an opportunity to work with NFDC to deliver the comprehensive redevelopment of the former Fawley Power Station site.</li> <li>▪ Agree that in principle the NPA should not have to plan for the full housing need identified, but commentary should be provided on the Local Plan housing target.</li> <li>▪ Any net new residential development should be restricted to local people.</li> <li>▪ New accommodation for the elderly should focus on meeting demands from within the communities of the National Park, rather than catering for external demands.</li> <li>▪ Divided views on the proposed restrictions on the size of net new dwellings – some representations stated that the draft policy is contrary to the NPPF requirement to plan for a mix of housing. The draft policy was considered unsound by some and will only deliver poor quality 1 or 2 bed properties.</li> <li>▪ Some support for seeking a lower site size threshold for affordable housing, with many respondents highlighting the need for viability testing.</li> <li>▪ Some support for allowing an element of open market housing on rural exceptions site to aid affordable housing delivery.</li> <li>▪ General support for the inclusion of specific policies on commoners' dwellings and Estate Worker's dwellings, subject to some detailed comments on wording.</li> <li>▪ General support for policies on replacement dwellings; extensions to dwellings and outbuildings, with some calls for these policies to be more restrictive.</li> <li>▪ <i>Whartons Lane, Ashurst</i>: Significant volume of objections regarding the precedent that would be established; traffic impacts; and the high housing density proposed.</li> <li>▪ <i>Former Lyndhurst Park Hotel</i>: Significant support for retaining elements of the existing building; providing affordable housing; and listing the existing building.</li> <li>▪ <i>Church Lane, Sway</i>: Majority of responses objected to the proposed allocation due to proximity of protected habitats; the scale of the proposed development; the density of housing proposed; and traffic impacts.</li> <li>▪ <i>The Yews, Cadnam</i>: Representations received regarding the proximity of the New Forest SPA; and surface water flood risk.</li> <li>▪ <i>Sites in East Boldre</i>: Objections raised regarding the sustainability of East Boldre as a settlement; the loss of back up grazing land; and urbanisation impacts.</li> </ul>
	<b>How the comments received have informed the Submission draft Local Plan</b>
	<ul style="list-style-type: none"> <li>▪ An updated assessment of housing needs arising in the National Park was undertaken in Autumn 2017 to inform the Submission draft Local Plan.</li> <li>▪ Significant work has been undertaken between the NPA and NFDC on the former Fawley Power Station site throughout 2017 and the Authority's Submission draft Local Plan supports the comprehensive redevelopment of the site.</li> <li>▪ The Submission draft Local Plan (and supporting papers) set out the process undertaken to arrive at the proposed quantum of new housing in the National Park.</li> <li>▪ The revised Local Plan seeks to maximise the delivery of housing for local people.</li> <li>▪ A new policy has been included that ensures the occupancy of new C2 development is tied to people with a local connection.</li> <li>▪ The Submission draft Local Plan has been subject to a detailed whole Plan viability assessment, focusing on the proposed affordable housing requirements and the policy restricting the size of new dwellings. The NPPF requires the planning system to deliver a mix of dwellings and the 100m<sup>2</sup> will deliver 1 – 3 bed dwellings in an areas where the existing stock is skewed towards larger dwellings.</li> <li>▪ The whole-Plan viability assessment has informed the revised Local Plan policies on affordable housing on windfall sites; allocations; and rural exceptions sites.</li> <li>▪ The Submission draft Local Plan retains the policies on commoners' dwellings and Estate Workers dwellings, with wording changes made in response to comments.</li> <li>▪ The inclusion of detailed policies on replacement dwellings, extensions and outbuildings is considered justified in light of development pressures on the Park.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ <i>Whartons Lane, Ashurst</i>: The tree belt surrounding the site is subject to a TPO to contain the development; a traffic assessment was undertaken in Autumn 2017; and the density of development equates to around 30 dwellings per hectare.</li> <li>▪ <i>Former Lyndhurst Park Hotel</i>: In line with comments from Historic England, the revised policy seeks the retention of elements of the existing building; Historic England have confirmed the building will not be nationally listed.</li> <li>▪ <i>Church Lane, Sway</i>: The scale of development has been reduced in the Submission draft Local Plan following Natural England's advice on development close to the New Forest SPA.</li> <li>▪ <i>The Yews, Cadnam</i>: The site has been removed from the Submission draft Local Plan given the immediate proximity of the New Forest SPA.</li> <li>▪ <i>East Boldre sites</i>: The sites have been removed from the Submission draft Local Plan given the immediate proximity of the New Forest SPA.</li> </ul>
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Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 8 Rural Economy</b>	<ul style="list-style-type: none"> <li>▪ The Local Plan lacks any flexibility to consider alternative uses for employment sites, including mixed uses (as encouraged by NPPF).</li> <li>▪ Concerns raised regarding how the draft Local Plan treats major attractions within the National Park - these should be explicitly acknowledged.</li> <li>▪ The draft policy wording on campsite provision is considered unduly restrictive.</li> <li>▪ The draft Local Plan does not conform with the NPPF which supports the change of use to residential use where there is an identified need for additional housing.</li> </ul>
	<b>How the comments received have informed the Submission draft Local Plan</b>
	<ul style="list-style-type: none"> <li>▪ The Submission draft Local Plan supports a range of alternative uses on employment sites, including mixed use (with residential) in the defined villages.</li> <li>▪ The policy wording has been update in the Submission draft Local Plan to make reference to major visitor attractions.</li> <li>▪ The New Forest National Park already has significant camping provision and therefore the policy wording is considered to be justified.</li> <li>▪ The Submission draft Local Plan supports the change of use of buildings to a range of uses. In line with meeting local affordable housing needs in the National Park, the Plan supports the re-use of building as rural exceptions sites.</li> </ul>

Area	Summary of main points raised on the consultation draft Local Plan (2016)
<b>Chapter 9 Transport &amp; Access</b>	<ul style="list-style-type: none"> <li>▪ A call for continued working between NFDC and NPA to better understand cumulative implications of growth proposals from both Local Plans.</li> <li>▪ The majority of respondents supported the inclusion of parking standards.</li> <li>▪ Improvements to access should only be made where appropriate &amp; when impacts on nature conservation can be avoided or adequately mitigated.</li> <li>▪ Calls to install average speed cameras at entrance &amp; exit points to the National Park to help reduce traffic speeds &amp; animal deaths.</li> <li>▪ The Local Plan should include opening up all forest tracks for use by cyclists.</li> <li>▪ Review use &amp; capacity of car parks</li> <li>▪ Include specific reference in the Local Plan to the England Coast Path.</li> </ul>
	<b>How the comments received have informed the Submission draft Local Plan</b>
	<ul style="list-style-type: none"> <li>▪ The NPA has worked with New Forest District Council in assessing the impacts of planned development contained within the respective Submission Draft Local Plans on traffic growth.</li> <li>▪ The Submission Draft Local Plan includes proposed parking standards.</li> </ul>



	<ul style="list-style-type: none"> <li>▪ The Local Plan should be read as a whole and therefore it was not considered necessary to amend this chapter to cross refer to nature conservation interests.</li> <li>▪ The measures outlined to tackle traffic issues are best taken forward through other routes, rather than the Local Plan, as planning permission is not required.</li> <li>▪ The opening up of forest tracks is best addressed through the concurrent review of the New Forest Recreation Management Strategy (RMS).</li> <li>▪ As above, discussions on the number, size and location of car parks are best taken forward through the review of the Recreation Management Strategy.</li> <li>▪ The Submission draft Local Plan includes suitable references to the Coast Path.</li> </ul>
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3.13 Following the end of the 8-week public consultation on the consultation draft Local Plan, all of the representations received were acknowledged, logged and a summary of the main points raised was made available for inspection at the Authority's office and via the Planning Policy section of the Authority's website.

(v) *'Call for Brownfield Sites' – February 2017*

3.14 Following an initial review of the consultation comments received (which included calls for the NPA to explore the development potential of brownfield sites); allied to the impending requirement for all planning authorities to prepare a brownfield sites register (subsequently introduced through the Town & Country Planning (Brownfield Land Register) Regulations 2017 (April 2017); the Authority launched a 'Call for Brownfield' sites running from February – April 2017. This was publicised to the general public, statutory consultees, public landowning bodies, local town and parish councils, and the major Estates in the New Forest. Site submissions were invited for an initial six-week period and sites continued to be accepted throughout Spring and Summer 2017.

3.15 During the 'Call for Brownfield Sites' process a total of 31 sites were submitted. All of the sites submitted were assessed in the same way that the previous 'Call for Sites' submissions has been and the Authority's Strategic Housing Land Availability Assessment (January 2018) provides more detail on this process.

(vi) *Consultation on Potential Alternative Housing Sites – June 2017*

3.16 Representations were received on the consultation draft Local Plan (October 2016) highlighting the potential impacts of development close to the nationally and internationally protected habitats of the New Forest. The Authority therefore initiated further liaison with Natural England officers on this issue and in May 2017 Natural England subsequently updated their advice to the Authority. This updated advice essentially stated that Natural England did not feel that potential urban edge impacts on the integrity of the New Forest Special Protection Area (SPA) could be ruled out from new residential allocations within 400 metres of the SPA. The same advice had been given to New Forest District Council as part of their concurrent Local Plan review process which covers the majority of the land surrounding the National Park.

3.17 A consequence of this May 2017 advice was that no greenfield site allocations within 400 metres of the New Forest SPA would be considered within the Authority's Local Plan review. This had significant implications for the draft Local Plan, which had in October 2016 identified potential development sites at East Boldre and Sway that lay within 400 metres of the New Forest Special Protection Area (SPA). It should also be noted that a significant number of the sites received through the 'Call for Sites' process were also affected by this updated advice.

- 3.18 With a number of potential housing sites being ruled out, the Authority took the decision to hold a further six-week non-statutory public consultation on potential alternative housing sites to inform the preparation of the Regulation 19 Submission draft Local Plan. It was felt to be too significant a step in the drafting of the Local Plan to go from the consultation draft Local Plan (October 2016) to the Regulation 19 Submission draft Local Plan without inviting representations from consultees on the potential changes.
- 3.19 The Authority therefore held a further six-week public consultation on a number of potential alternative housing sites between 14 June and 26 July 2017. As with previous Local Plan consultations (Regulation 18 consultation, September 2016; and consultation on draft Local Plan, October 2016) all statutory consultees, other consultees, and people who had previously made representations during the Local Plan review process were directly notified of this consultation. The Authority also held three further public drop in sessions for people to find out more about the potential housing sites. These were held in Calshot, Ashurst and Copythorne in July 2017 as these were the settlements where potential alternative housing sites had been identified.



Photos from the public drop-in events held in Calshot (left) and Copythorne (right) in July 2017 as part of the six week public consultation on potential alternative housing sites.

- 3.20 The aim of the public consultation was to seek feedback on the potential housing sites identified. The events – two of which were outdoors and based around the Authority’s mobile information unit – were attended by over 200 people. During the six-week public consultation feedback was received from 57 individuals and organisations on the four potential alternative housing sites identified. Set out below is a summary of the main points raised during this Summer 2017 consultation and how the comments received have informed the Submission draft Local Plan. The first part of the summary focuses on the four potential alternative development sites identified in the consultation document, with the final table summarising the other comments received during the public consultation. Respondents included a number of statutory consultees (e.g. Natural England, Environment Agency), local town and parish councils, neighbouring planning authorities (e.g. New Forest District Council, Test Valley Borough Council), local residents and site promoters.

Land at Ashurst Hospital (27 comments)	
Summary of main comments	NPA responses
<ul style="list-style-type: none"> <li>• Support for the principle of brownfield sites such as Ashurst Hospital being considered for development.</li> <li>• The future use of the site and its timescales are uncertain and so the site's deliverability has not been proven.</li> <li>• The Ashurst Hospital site should be redevelopment instead of the greenfield site identified at Whartons Lane, not in addition to.</li> <li>• The historical buildings on the site, including the chapel, should be preserved in any redevelopment.</li> <li>• Evidence is required as to where the healthcare services would be re-provided.</li> <li>• Concerns raised regarding impacts on immediately adjacent SPA.</li> <li>• There are outstanding landownership issues relating to the original transfer of the land from the Open Forest in the 1830s.</li> </ul>	<ul style="list-style-type: none"> <li>• The NPA has continued to liaise with the NHS over their future intentions for the site throughout the latter part of 2017.</li> <li>• Given the identified housing need in the Park (and the planned under-provision), the Ashurst Hospital site would be an additional site allocation, not a replacement for other identified sites.</li> <li>• It is understood that should the site come forward for future redevelopment, the chapel would be retained.</li> <li>• The NHS are working up details on the re-provision of existing healthcare services.</li> <li>• Any future proposals would require a Habitats Regulations Assessment (HRA).</li> <li>• The terms of the original land transfer have been explored. It has been concluded that these do not prevent the redevelopment of the site.</li> <li>• <i>Given current uncertainties around the future of the Hospital site, it is not allocated for future housing use in the Submission draft Local Plan.</i></li> </ul>

Land at Uncle Tom's Cabin, Romsey Road, Cadnam (39 comments)	
Summary of main comments	NPA response
<ul style="list-style-type: none"> <li>• Concerns raised regarding the impact of development on the residential amenity of neighbouring properties.</li> <li>• The area is severely affected by surface water flooding as confirmed by Environment Agency mapping.</li> <li>• The existing sewerage capacity in the area is substandard.</li> <li>• There is a conflict between users of the right of way and the proposed access to the site.</li> <li>• Alternative sites in the parish should not be ruled out solely due to their proximity to the New Forest SPA.</li> </ul>	<ul style="list-style-type: none"> <li>• The New Forest Strategic Flood Risk Assessment (SFRA) confirms that the site is subject to surface water and fluvial flooding.</li> <li>• The potential impacts of development on the integrity of the internationally protected New Forest SPA must be considered in the Local Plan-making process, as required by law.</li> <li>• <i>On the basis of the flood risk mapping (completed in Autumn 2017), the site is not proposed for allocation within the Authority's Submission draft Local Plan.</i></li> </ul>

Land to the south of Fawley Power Station (42 comments)	
Summary of main comments	NPA response
<ul style="list-style-type: none"> <li>• There is a positive case to be made for development in the National Park if it is necessary to support the comprehensive redevelopment of the site.</li> </ul>	<ul style="list-style-type: none"> <li>• A site-specific viability assessment was commissioned by NFDC and NFNPA to examine the case for development within the National Park. This concluded it was</li> </ul>

<ul style="list-style-type: none"> <li>• Conversely, some felt that it is inappropriate for developers to effectively re-draw the boundary of the Park to enable significant housing development.</li> <li>• The purchase cost of the brownfield site should be reflected the need to limit development to the brownfield site only.</li> <li>• If housing is to be supported in the Park, it must meet the NPA's policy objectives for smaller, affordable dwellings.</li> <li>• Significant infrastructure improvements are required to support the development.</li> <li>• Concerns regarding the impact of development on the adjacent SINC.</li> </ul>	<p>required to support the redevelopment of the brownfield site.</p> <ul style="list-style-type: none"> <li>• An assessment has been completed of the proposals for the site against the tests set in paragraph 116 of the NPPF to support major development in the Park.</li> <li>• <i>The Authority's Submission draft Local Plan proposes the allocation of the site subject to various criteria relating to affordable housing, dwelling sizes and habitat mitigation. This has been informed by evidence base studies and discussions between the NPA, the site owner and New Forest District Council</i></li> </ul>
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Land at St George's Church Hall, Calshot (22 comments)	
Summary of main comments	NPA response
<ul style="list-style-type: none"> <li>• The provision of a limited amount of new dwellings would benefit the socio-economic well-being of the village and diversify its housing stock.</li> <li>• Objections to development in Calshot on the basis of the lack of services.</li> <li>• Queries as to why the proposed cemetery area would be reduced in scale only a year after it received planning permission.</li> <li>• Objections to the provision of further affordable housing in the village.</li> <li>• Wastewater and water supply infrastructure cross the site and the layout of any future development should take these into account.</li> <li>• The development should include the refurbishment of St George's Hall for community use.</li> </ul>	<ul style="list-style-type: none"> <li>• The development provides the opportunity to diversify the housing stock in the village.</li> <li>• The landowner has been asked to prepare an indicative site layout showing how the different uses can be accommodated on the site. This includes the St George's Hall building.</li> <li>• The proposed redevelopment of the adjacent Fawley Power Station site will significantly enhance the infrastructure, services and employment opportunities in the Calshot area, improving its sustainability.</li> <li>• <i>Linked to the NPA's duty to foster the socio-economic well-being of local communities, the Authority's Submission draft Local Plan proposes a mixed use development of this site.</i></li> </ul>

#### 4. Regulation 19 Submission draft Local Plan 2016 – 2036

- 4.1 The proposed Submission draft Local Plan (representing the Regulation 19 stage in the Government's planning regulations) was approved for the purposes of a final 6-week consultation at the National Park Authority meeting on 14 December 2017.
- 4.2 The final 6-week public consultation ran from 17 January 2018 – 28 February 2018. This Regulation 19 consultation stage was undertaken in accordance with Policy SCI-2 in the National Park Authority's adopted Statement of Community Involvement (2013) and the requirements of the regulations, with all of the main documents available electronically on the Authority's website and for inspection at Lymington Town Hall. The consultation was publicised in the following ways:
- A formal public notice was posted in the Lymington Times newspaper on 19 January 2018;

- Consultation posters were exhibited at all 9 Local Information Points in and around the National Park highlighting the consultation period and how the Local Plan (and supporting documents) could be viewed.
- Updates on the Submission draft Local Plan were given at the regular Parish Quadrant meetings (in January and February 2018) and at the New Forest Consultative Panel prior to and during the final 6 week consultation.
- The National Park Authority included regular updates on the consultation via its Facebook page and Twitter account.
- Everyone who had submitted representations at the Regulation 18 stage and the other (non-statutory) consultations undertaken prior to the publication of the Regulation 19 Local Plan was directly notified of the consultation.

4.3 All general consultation bodies and specific consultation bodies were directly notified of the consultation on the Regulation 19 Submission draft Local Plan. Annex 2 to this Statement sets out the bodies consulted on the Regulation 19 draft Local Plan in January 2018. As outlined above, everyone who has engaged in the Local Plan-making process to date – including all those who have made representations during any of the previous consultation stages dating back to Summer 2015; or submitted sites through the various ‘Call for Sites’ processes – were directly notified of the final consultation period on the Regulation 19 Submission draft Local Plan.

4.4 In accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this Consultation Statement sets out the number of representations made on the Authority’s Submission draft Local Plan (January 2018) and provides a summary of the main issues raised in those representations. **A total of 645 representations were received on the proposed Submission draft Local Plan 2016 – 2036 during the statutory 6-week consultation period, made by a total of 188 respondents.** As the Authority published what it considers to be a ‘sound’ Local Plan in January 2018, at this final consultation stage the Authority is limited in the extent to which any further amendments can be made to the Submission draft Local Plan. It should also be emphasised that all of the duly made representations received during this final 6-week consultation will be submitted in full to the Secretary of State for independent examination in May 2018.

Chapter	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 1 Introduction</b>	<ul style="list-style-type: none"> <li>▪ Test Valley Borough Council supports the active work undertaken by the Authority under the ‘duty to cooperate’. The Borough Council wishes to continue joint working on cross boundary matters, including on mitigating the impacts of development on the Natura 2000 sites in the National Park.</li> <li>▪ A call was made for greater reference to be made to the Sandford Principle in setting the context for considering development proposals in the Park.</li> <li>▪ The New Forest Association considers that paragraph 1.16 does not contain an accurate precis of the National Parks Circular (2010) and should be amended accordingly to emphasis that the limited development that does take place within the National Park should be focused on meeting local needs.</li> </ul>

Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 2 Profile of the Park</b>	<ul style="list-style-type: none"> <li>▪ The list of settlements with basic rural services (paragraph 2.10) should be expanded to include settlements such as Beaulieu.</li> <li>▪ Concerns raised regarding the impact of increased overflying of the National Park linked to the expansion of Bournemouth and Southampton Airports, yet the Plan includes no policies to control overflying.</li> <li>▪ The New Forest Association objects to paragraph 2.16 regarding the Port of Southampton Masterplan and suggest it should be re-worded. The RSPB call for additional wording in the paragraph to highlight that any future proposals for port development would need to be assessed against the Habitat Regulations. Conversely, the representation received from ABP proposed the deletion of some of the wording on Dibden Bay and the inclusion of additional wording regarding the status of the land.</li> <li>▪ Historic England welcomes the references to the heritage assets, both designated and non-designated, in the National Park as part of the positive strategy for the conservation and enjoyment of the historic environment.</li> </ul>

Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 3 Vision and Objectives</b>	<ul style="list-style-type: none"> <li>▪ Representations received highlighted the potential conflicts between the projected increase in the number of visitors to the National Park and the range of protected habitats and species in the New Forest.</li> <li>▪ The New Forest Association's representation calls for the Local Plan to recognise that there is a backlog of key issues to be address, including a declining environment and increasing recreational pressures.</li> <li>▪ Historic England welcomes strategic objective 2 as part of the positive strategy for the conservation and enjoyment of the historic environment of the Park required by the NPPF.</li> <li>▪ The CPRE highlight the need to balance meeting housing needs with the conservation and protection of the natural assets of the Forest. Without an appropriate balance the economy of the New Forest will be jeopardised and the reason for National Park designation becomes meaningless.</li> <li>▪ The Barker-Mill Estate objection states that the planned under provision of housing against the identified local housing need means that objectives 4 and 5 will not be met and the Local Plan has failed to plan positively.</li> </ul>

Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 4 Strategic Policies</b>	<ul style="list-style-type: none"> <li>▪ <i>Policy SP1: Sustainable Development:</i> Support received to the inclusion of reference to the 'special qualities' of the National Park. Hampshire County Council agrees with the approach of Policy SP1 of making use of sustainable building techniques, local materials and minimise energy use and waste. The Barker-Mill Estate's objection to policy SP1 states that they do not feel that the Local Plan complies with the presumption in favour of</li> </ul>

	<p>sustainable development, it is not consistent with national policy and has not been positively prepared.</p> <ul style="list-style-type: none"> <li>▪ <i>Policy DP2: General Development Principles:</i> Support for the protection of trees in policy DP2 (Godshill Parish Council).</li> <li>▪ The RSPB and the Hampshire &amp; Isle of Wight Wildlife Trust support the proposed text in section 4.11 to 4.14 setting out the relevant provisions of the Habitats Regulations that will need to be complied with in reaching a decision on any such proposal at Dibden Bay.</li> <li>▪ <i>Policy SP3: Major Development:</i> Natural England support policy SP3. Fawley Waterside support policy SP3, which they consider correctly summarises the national policy approach to major development in National Parks. ABP object to policy SP3 which they consider to be unsound as it is not consistent with paragraph 116 of the NPPF. The emerging policy is considered to be more onerous than national policy.</li> <li>▪ <i>Policy SP4: Spatial Strategy:</i> Wiltshire Council's representation notes that while it is appropriate to refer to relationships between a Plan area and that of a neighbouring authority, it will be a matter for those Local Plans to determine the suitability or otherwise of their areas for development. A number of landowners (e.g. Hinton Admiral Estate) objected to the spatial strategy, stating that it fails to take advantage of the opportunity to develop sites on the periphery of the National Park which would not harm the landscape and scenic beauty of the Park.</li> </ul>
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Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 5 Protecting and Enhancing the Natural Environment</b>	<ul style="list-style-type: none"> <li>▪ The New Forest Association and the RSPB call for the Local Plan to outline the trend of decline in important species and habitats in the New Forest. The New Forest Association also raise concerns regarding the revised draft Habitat Mitigation Scheme and call for the Authority to lead the development of a sub-regional mitigation strategy for the New Forest.</li> <li>▪ <i>Policy SP5: Sites of International Importance:</i> Natural England's representations highlight that the recreational impacts of development can potentially be addressed through the Authority's revised habitat mitigation scheme and through contributions towards the Solent recreation mitigation partnership's scheme. The policy should also refer to other potential impacts as well as recreation.</li> <li>▪ <i>Policy SP6: The Natural Environment:</i> The RSPB welcome the commitment in SP6 that development likely to have an adverse effect on a SSSI will not be permitted, and consider that development should always demonstrate a net gain in biodiversity in order to be approved.</li> <li>▪ <i>Policy DP8: Water Resources:</i> Natural England and Wessex Water support DP8 and the proposals to safeguard and improve water resources. Natural England advises that DP8 should include reference to the River Avon SAC.</li> <li>▪ <i>Policy SP9: Green Infrastructure:</i> A number of developers and landowners (e.g. Hinton Admiral Estate) raised objections to policy SP9 and the proposed restrictions on the development of Suitable Alternative Natural</li> </ul>

	<p>Greenspace (SANGs) in the National Park. These representations state that the Local Plan should support SANG proposals where they would provide new public access to parts of the National Park and enhance its landscape, in accordance with the two Park purposes. Representations of support for policy SP9 were also received (e.g. the Commoners Defence Association) calling for the provision of new greenspace in areas outside the National Park to be prioritised to protected the special qualities of the Park. Fawley Waterside's representations state that Fawley Waterside is clearly an exception to the policy because the National Park boundary is drawn so tightly around the site that a viable sustainable community could not be created within the District Council boundaries alone.</p> <ul style="list-style-type: none"> <li>▪ <i>Policy DP10: Open Space:</i> Hampshire County Council, Southern Water, Barker-Mill Estate and Sport England object to policy DP10, as they consider the policy protection for open space to be overly restrictive and that in exceptional circumstances development on existing public open space (including school playing fields) can be justified.</li> <li>▪ <i>Policy DP12: Flood Risk:</i> Copythorne Parish Council welcome the acknowledgement that there are surface water flooding issues in the Cadnam area and call for surface water flooding issues to be more fully investigated in the Copythorne Parish area.</li> <li>▪ The CPRE considers policy SP15 on tranquillity to be rather weak.</li> </ul>
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Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 6 Protecting and Enhancing the Historic &amp; Built Environment</b>	<ul style="list-style-type: none"> <li>▪ Historic England considers the historic evidence base for the Local Plan to be compliant with the requirements of the NPPF.</li> <li>▪ Historic England welcomes the recognition of non-designated heritage assets, historic landscapes, the Historic Environment Record, the local list and Heritage at Risk. They also welcome the Authority's commitment to a local list and to the management of Conservation Areas.</li> <li>▪ <i>Policy SP16: Historic &amp; Built Environment:</i> Historic England welcomes and supports, in principle, Policy SP16 as part of the positive strategy for conservation and enjoyment of the historic environment of the Park required by the NPPF, which should include strategic policies to deliver the conservation and enhancement of the historic environment. They consider Policy SP16 fulfils this requirement. Policy SP16: Objections raised by a local developer regarding the interaction between policy SP16 – which seeks to conserve the character of the built environment of the Park – and policy SP21, which limits the size of net new dwellings to 100m<sup>2</sup>. Pegasus Life also objected to the wording of SP16, commenting that the structure of part a) misinterprets the NPPF's approach toward assessing significance and balancing benefits against any negative impact on designated and non-designated heritage assets.</li> <li>▪ <i>Policy DP18: Design Principles:</i> The Barker-Mill Estate object to the requirement in policy DP18 to achieve the highest standards for new design. The Estate considers that this places an unrealistic expectation on all new development - the policy should instead allow for each development proposal to be considered on its own merits, in terms of viability etc.</li> </ul>



Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<p><b>Chapter 7 Vibrant Communities</b></p>	<ul style="list-style-type: none"> <li>▪ <i>Policy SP19: New Residential Development:</i> A number of landowners (e.g. Barker-Mill Estates) object to the methodology used to calculate the housing need arising in the National Park (Justin Gardner Consulting Report, 2017) and suggest the housing need is higher than stated in the Local Plan. In addition, a number of representations call for Policy SP19 to be more supportive of the residential use through the re-use or conversion of redundant buildings, in accordance with paragraph 55 of the NPPF. The New Forest Association's representation states that there is no obligation on the Authority to meet the identified housing need and instead focus should be on meeting local affordable housing needs. The RSPB agrees that national guidance on meeting housing needs must be considered alongside the protection afforded to the New Forest by national and international designations and legislation. Wiltshire Council welcome the Submission Draft Plan as well as the positive approach taken to planning for housing within the National Park to contribute towards meeting identified need, including the allocation of sites.</li> <li>▪ <i>Policy SP20: Housing for Older People:</i> A number of representations call for specialist housing for older people to be restricted to people currently living within the National Park (35,000 people), rather than people living in parishes that include land within the National Park (which includes another 100,000 people). Conversely, Pegasus Life object to the principle of restricting age-related development to existing Park residents only.</li> <li>▪ <i>Policy SP21: Size of new dwellings:</i> Parish Council support for the proposed restrictions on the size of new dwellings (e.g. Godshill Parish Council). Objections were received from planning agents, developers and landowners (e.g. Pennyfarthing Homes, Barker-Mill Estate) to the proposed restriction on the basis that the SHMA does not conclude that every new dwelling should be 'smaller', only that there should be a focus on smaller dwellings. The alternative proposed is to allow a greater mix of dwellings in the National Park, including 5+ bedroom dwellings due to the concern that the policy will not provide a range and mix of dwelling types. It is claimed that the Authority has not provided evidence that family housing can be accommodated in less than 100m<sup>2</sup>. By forcing smaller units into the Park the character of the area will be detrimentally changed. The NFU object to policy SP21 on the grounds that the proposed floorspace limit would not allow dwellings for agricultural, Estate workers and land management purposes to be fully functional.</li> <li>▪ A significant number of representations to this chapter raised concerns regarding the principle of housing land allocations in the National Park and the view that the Authority should be pressing neighbouring planning authorities to accommodate the identified need in the National Park given the level of protection afforded to the New Forest through national policy.</li> <li>▪ A number of representations felt that Natural England's position on the allocation of land for housing within 400m of the SPA have been attributed too much weight in the preparation of the Plan. There was a call to remove the 400 metre restriction so that housing needs can be met.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ <i>Policy SP22: Whartons Lane, Ashurst.</i> The vast majority of the 50+ representations received on this proposed allocation raised objections (including Ashurst &amp; Colbury Parish Council and the Keep Ashurst &amp; Colbury Green Group). Concerns raised included the principle of greenfield development within the National Park; the erosion of the gap between Ashurst and Totton; the loss of land that has been used in the past as back up grazing land; traffic impacts on Whartons Lane; the availability of alternative brownfield sites in the village (Ashurst Hospital); surface water flooding affecting properties along Whartons Lane and Foxhills; and concerns regarding the density of the proposed development which is seen as too high and contrary to the local character of the village. Some respondents also felt that Ashurst was being asked to accommodate a disproportionately high level of planned development compared to other settlements in the National Park. The landowner confirmed that the site is deliverable and developable. Hampshire County Council note that a Transport Assessment (TA) was carried out on the main junction access in 2017 (Whartons Lane/A35) and this demonstrated the junction would work well within capacity on the trip generations generated from the new development site.</li>   <li>▪ <i>Policy SP23: Lyndhurst Park Hotel.</i> Lyndhurst Parish Council objects to the development of 50 dwellings on the site, which it considers to be far too many dwellings. The Parish Council does not consider that 50 dwellings on the site will conserve and enhance the Lyndhurst Conservation Area. A number of representations were also received supporting the principle of redeveloping the site, which some feel has become an eyesore. Historic England welcome and support criteria b) and c) of Policy SP23 as providing protection for heritage assets in line with the NPPF. The current site owner (Pegasus Life) broadly support the allocation of the former hotel site for redevelopment, but object to certain aspects of the policy. They consider that it should be made clear that the comprehensive development of the site should be residential-led and should deliver a minimum of 50 houses. They also state that there is no available evidence that suggests a suitable and sustainable tourism use exists that would retain the hotel building. Hampshire County Council representation states that given the access to the site via the A35 and the fact that it sits adjacent to the Lyndhurst Air Quality Management Area, a Transport Assessment will be required to assess the impact any development traffic would have on this area.</li>   <li>▪ <i>Policy SP24: Church Lane, Sway.</i> The landowners support the principle of allocating the site and confirm that the site is available and deliverable. A number of representations supported housing for local people to meet the identified need in the parish. The majority of respondents raised objections regarding the principle of greenfield development in the National Park; the loss of back up grazing land close to the Open Forest; traffic impacts on Church Lane; the loss of the hedgerows and trees on the edge of the site; and the density of the proposed development which is considered to be too high for an edge of village location. Some respondents called for a smaller development on the site of between 20 – 30 dwellings and for the new informal open space provision to be designated as a Local Green Space. A sign letter was also received on behalf of 21 signatories of the CHOC23 Group objecting to the proposed development on the ground of the density of development, access and impact on local character. The letter also called for the site to be</li> </ul>
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	<p>integrated with the Jubilee Fields site through pedestrian links. Sway Parish Council support the proposed reduction in the site area to avoid development within the SPA 400 metre zone. The Parish Council raise concerns regarding the loss of back up grazing land; the density of the proposed development; the impacts on local infrastructure; and the need to protect trees and hedges around the periphery of the site.</p> <ul style="list-style-type: none"> <li>▪ <i>Policy SP25: Land to the south of Fawley Power Station:</i> New Forest District Council supports the inclusion of policy SP25 which is considered essential to the delivery of the overall scheme for 1,500 dwellings and 2,000 jobs. Fawley Waterside endorse the proposed allocation to support the comprehensive regeneration of the adjacent 49 hectare brownfield site. Objections were received from local and national groups (e.g. Campaign for National Parks) highlighted the conflicts with the major development test in paragraph 116 of the NPPF; the failure to comply with the statutory National Park purposes; the relative inaccessibility of the site given the congestion on the A326; and the impacts on the protected habitats of the New Forest (including the direct loss of SINC habitat) and the Solent coastline from increased recreational pressures. The RSPB advise that a robust package of bespoke SANGs, access management and wardening will be essential to mitigate potential impacts. The Wildlife Trust's representation states that there should be a requirement to compensate the losses of SINC habitat through the enhancement of the remaining habitat and the provision of alternative habitats of equivalent or higher value. Natural England agree that there is potential for the proposals at Fawley to meet the major development tests. And that the proposals will be required to provide substantive landscape, biodiversity and access enhancements that will more than offset any harm caused.</li> <li>▪ <i>Policy SP26: Land at Calshot Village:</i> The landowner (New Forest District Council) welcomes and supports the proposed allocation of the site for residential and cemetery use. Fawley Waterside support the allocation, which would broaden the range of housing and enhance the environment in Calshot. A number of objections were received to the proposed allocation on the basis of the lack of facilities in Calshot and its current relative inaccessibility. Representations of support were also received stating that the village would benefit from some residential development to diversify the housing stock and support local services.</li> <li>▪ <i>Omission sites:</i> Representations were received calling for additional housing land allocations in the National Park due to the predicted shortfall in development against the identified housing need in the National Park. Site proposed include Hyde Garden Shop; land at Redlynch; the former B &amp; W Nursery site, Plaitford; land at West Street, Hythe (for housing and a Park &amp; Ride facility); a former plant nursery site at Stuckton; land at Romsey Road, Cadnam; land at Brockenhurst Manor Golf Course; 2.14ha of land at Foxhills, Ashurst; land at Ashurst Hospital; and land at Ramley Road, Pennington. A number of these sites are located on the edge of the National Park and are more closely related to settlements outside the Park. The various site promoters state that development in such locations would represent a more sustainable form of development. The Ashurst Hospital site has been promoted by the NHS for alternative uses including residential, care and extra care accommodation.</li> </ul>
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	<ul style="list-style-type: none"> <li>▪ <i>Policy SP27: Affordable Housing:</i> New Forest District Council – in their capacity as the housing authority for 94% of the National Park – strongly support the affordable housing policy target of 50% on-site affordable housing. This support was echoed by Sway Parish Council, who cite the profile of development in the National Park (characterised by smaller developments) to justify the policy approach. The Hampshire Alliance for Rural Affordable Housing (HARAH) support the 50% affordable housing target on allocated sites and those within the defined villages. Given the environmental designation in the National Park, Wiltshire Council supports the approach in policy SP27 that proposes a lower threshold than the Government's NPPG.</li> <li>▪ <i>Policy SP28: Rural Exception Sites:</i> New Forest District Council strongly support the policy and the recognition that shared ownership and affordable rented housing (as well as social rented housing) will assist in addressing local housing needs. Representations were received from landowners and developers (e.g. Hinton Admiral Estate) objecting to the policy and stating that an allowance should be made for an element of open market housing on rural exceptions sites as enabled by the NPPF.</li> <li>▪ <i>Policy SP29: Commoners Dwellings:</i> The Commoners Defence Association object to the proposed reduction in the size of commoners dwellings from 120m<sup>2</sup> to 100 m<sup>2</sup>, which it is suggested will put the scheme at risk. This runs counter to established local planning policies, dating back to 2001, which recognise the need for larger commoners dwellings. Objections were received to the proposed composition of the Commoners Dwelling Scheme Panel, with the suggestion that the New Forest Association should also be represented.</li> <li>▪ <i>Policy SP30: Estate Workers Dwellings:</i> The CPRE representation states that criteria (d) of Policy SP30 is important to prevent Estates selling off properties and then seeking more. Conversely, a number of Estates (e.g. Beaulieu, Cadland and Hinton Admiral) object to criteria (d) as making the policy unworkable. The Hinton Admiral representation states that the Whole Estate Plan proposal merits support and further development, but that the policy stimulus (i.e. the ability to develop 3 Estate workers houses) is insufficient. The Beaulieu Estate's representations call for the definition of Estate Workers to include retired Estate Workers.</li> <li>▪ <i>Policy SP33: Gypsies, Travellers and Travelling Showpeople:</i> A number of respondents (including Landford Parish Council) raised concerns regarding the proximity of the site to Landford Bog SSSI and SAC; potential conflicts with Landford Common and the provisions of the adopted Landford VDS; the gradual suburbanisation of the area; and the over-concentration of gypsy and traveller sites in the Landford area. A representation of support was also submitted, highlighting the fact that the site drains into the main sewer network; and that Natural England has raised no concerns regarding the ecological impact on an additional pitch.</li> <li>▪ <i>Policy DP35: Replacement Dwellings:</i> Objections were received from planning agents to the proposed restriction on replacement dwellings. The case was made that the policy restrictions are out of step with national Permitted Development Rights and that applications should be assessed on a case-by-case basis without reference to a mathematical floorspace calculation. A number of local parish councils (e.g. Sway</li> </ul>
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	<p>Parish Council) supported the proposed policy restrictions on replacement dwellings. A limited number of representations were also received calling for the Local Plan to take a more enabling approach to the sub-division of dwellings outside the defined villages.</p> <ul style="list-style-type: none"> <li>▪ <i>Policy DP36: Residential Extensions:</i> Support from a number of parish councils to restriction the size of residential extensions (e.g. Hale Parish Council). The New Forest Association and the Friends of Brockenhurst called for the restriction on residential extensions to apply within the defined villages, as well as outside. Objections were received from local planning agents who called for an alternative approach where extensions were assessed on their merit and landscape impact.</li> <li>▪ <i>Policy DP37: Outbuildings:</i> Sway Parish Council feel that the policy remains insufficient to prevent circumvention of the policy on residential extensions and call for the policy to be further tightened.</li> </ul>
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Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 8 Rural Economy</b>	<ul style="list-style-type: none"> <li>▪ <i>Policy SP42: Business and Employment Development:</i> The Hinton Admiral Estate and other landowners object to the lack of employment allocations, which it is felt conflicts with the Authority's duty to foster the socio-economic well-being of local communities. Objections were received from the owners of the employment site at Castle Malwood regarding the absence of a site specific policy to promote economic growth and to enable sustainable development on a brownfield site.</li> <li>▪ <i>Policy SP43: Existing Employment Sites:</i> New Forest District Council supports the proposed policy approach to retain and make best use of existing employment sites. Representations were also received calling for the provisions in draft policy SP43 that support mixed use development on existing employment sites in the defined villages to be extended to cover employment sites across the whole of the National Park.</li> <li>▪ <i>Policy DP44: Redevelopment of Existing Employment Sites:</i> Objections were received stating that policy DP44 is too restrictive and there was a call to support B8 storage and warehousing, which can provide more job opportunities than some B1(c) and B2 uses.</li> <li>▪ <i>Policy DP47: Extensions to Holidays Parks and Camp Sites:</i> A number of site owners call for a more enabling approach to support investment in new facilities and accommodation at Holiday Parks such as tree houses, log cabins, and holiday lodge caravans, shepherds huts, and camping pods. A more positive approach would help deliver the Authority's socio-economic duty. The Beaulieu Estate's representations call for the policy to be amended to support new campsites in appropriate locations where established sites elsewhere in the New Forest have been lost.</li> <li>▪ <i>Policy SP48: The Land-based Economy:</i> The Commoners Defence Association and the Verderers of the New Forest welcome policy SP48 and the continued support for commoning as part of the land based economy. The Verderers representation states that the availability of back up grazing land is essential for commoning, although it also recognises that some development is inevitable and essential to provide affordable</li> </ul>

	<p>housing and commoners dwellings. The Hinton Admiral Estate object to policy SP48 and the aim of protecting back up grazing land, which it is claimed is not a material planning consideration.</p> <ul style="list-style-type: none"> <li>▪ A number of representations of support were received from parish councils (e.g. Godshill), local residents and representative groups to the wording in paragraph 8.29 regarding pop up camp sites and the need to consider the use of an Article 4 direction to address the issue.</li> <li>▪ <i>Policy DP50: Agricultural and Forestry Buildings:</i> The National Trust considers that Policy DP50 should be amended to allow for the erection of new buildings required not only in association with agriculture and forestry, but also for conservation based land management.</li> </ul>
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Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Chapter 9 Transport &amp; Access</b>	<ul style="list-style-type: none"> <li>▪ <i>Policy SP54: Transport Infrastructure:</i> Support for proposals to keep people off the roads through safe off road cycling and walking routes.</li> <li>▪ A number of representations highlighted the likely impacts of traffic associated with development planned outside the National Park and stated that the Authority should be looking at more radical traffic solutions. Sway Parish Council suggests that greater consideration could be given to introducing a 20 mph speed limit in parts of the National Park.</li> <li>▪ The New Forest Association criticised the lack of progress made by Hampshire County Council and the Authority on ensuring local highways works reflect the local distinctiveness of the National Park.</li> <li>▪ <i>Policy SP55: Access:</i> The New Forest Access Forum's representation states that policy SP55 should more explicitly address the need for utility walking and cycling routes to local services and amenities. The Forum strongly believes there should be access for all, with connectivity for both recreation and for access to services and amenities.</li> </ul>

Area	Summary of main points raised on the proposed Submission draft Local Plan 2016 – 2036 (January 2018)
<b>Annexes</b>	<ul style="list-style-type: none"> <li>▪ <i>Annex 2:</i> Representations were received (including Sway Parish Council) highlighting that the parking standards contained with Annex 2 of the Plan should include provision for retail development. This has been addressed in a proposed minor modification to the Local Plan.</li> <li>▪ <i>Annex 2:</i> Wiltshire Council's representation notes that while only a small area of the National Park is within Wiltshire, any development that does take place within the Wiltshire part of the Park should reflect the relevant standards as set out in Wiltshire Council's Parking and Cycling Strategies.</li> <li>▪ <i>Annex 3:</i> Wiltshire Council also states that any development that takes place in the Wiltshire part of the Park should reflect Wiltshire Council's affordable housing local connections criteria. This has been addressed in a proposed minor modification to the Local Plan.</li> </ul>



## **Annex 1 – List of groups and organisations consulted during the Regulation 18 Local Plan Issues and Scope consultation (September – October 2015)**

Historic England South East Region  
 Historic England South West Region  
 Natural England  
 Forestry Commission  
 Environment Agency  
 Verderers of the New Forest  
 MMO South Eastern Marine Area  
 Highways Agency  
 National Grid Property  
 Bournemouth Water  
 Wessex Water  
 Southern Water  
 NHS England South East office

Ashurst & Colbury Parish Council  
 Beaulieu Parish Council  
 Boldre Parish Council  
 Bramshaw Parish Council  
 Bransgore Parish Council  
 Breamore Parish Council  
 Brockenhurst Parish Council  
 Burley Parish Council  
 Copythorne Parish Council  
 Denny Lodge Parish Council  
 East Boldre Parish Council  
 Ellingham, Harbridge & Ibsley Parish Council  
 Exbury & Lepe Parish Council  
 Fawley Parish Council  
 Fordingbridge Town Council  
 Godshill Parish Council  
 Hale Parish Council  
 Hordle Parish Council  
 Hyde Parish Council  
 Hythe & Dibden Parish Council  
 Landford Parish Council  
 Lymington & Pennington Town Council  
 Lyndhurst Parish Council  
 Marchwood Parish Council  
 Melchet Park & Plaitford Parish Council  
 Milford on Sea Parish Council  
 Minstead Parish Council  
 Netley Marsh Parish Council  
 New Milton Town Council  
 Redlynch Parish Council  
 Ringwood Town Council  
 Sopley Parish Council  
 Sway Parish Council  
 Totton & Eling Town Council

Wellow Parish Council  
 Whiteparish Parish Council  
 Woodgreen Parish Council  
  
 Dorset County Council  
 Southampton City Council  
 Christchurch Borough Council  
 East Dorset District Council  
 Wiltshire Council  
 Wiltshire Council  
 Hampshire County Council  
 New Forest District Council  
 Test Valley Borough Council

Desmond Swayne MP  
 Julian Lewis MP  
 Christopher Chope MP  
 Caroline Nokes MP  
 John Glen MP  
  
 Action Hampshire  
 Age Concern Hampshire  
 Associated British Ports  
 Beaulieu Estate  
 Bournemouth International Airport Ltd  
 Cadland Estate  
 Calshot Activities Centre  
 Campaign for National Parks  
 Community First New Forest  
 Country Land and Business Association  
 Cranborne Chase & West Wilts Downs AONB  
 Exbury Estate  
 ExxonMobil Chemical Ltd  
 Friends, Families and Travellers  
 Fordingbridge Society  
 Friends of Brockenhurst  
 Hampshire and Isle of Wight Wildlife Trust  
 Hampshire Association of Local Councils  
 Hampshire Field Club & Archaeological Society  
 Hampshire Fire & Rescue Service (New Forest Group)  
 Hampshire Gardens Trust  
 Hampshire Scouts  
 Hamptworth Estate  
 Homes and Communities Agency  
 Lepe Country Park  
 Lymington & District Chamber of Commerce & Industry Limited



Lymington Harbour Commissioners  
Lymington Society  
Jackson Planning  
Meyrick Estate  
National Farmers' Union  
National Trust  
Network Rail  
New Forest Access for All  
New Forest Access Forum  
New Forest Association  
New Forest Association of Local Councils  
New Forest Business Partnership  
New Forest Centre  
New Forest Commoners' Defence Association  
New Forest Equestrian Association  
New Forest Friends of the Earth  
New Forest Hounds  
New Forest Runners Club  
New Forest Sports Council  
New Forest Tourism Association  
New Forest Transition  
New Forest Trust

Pylewell Estate  
Ramblers Association (New Forest Branch)  
Ringwood Chamber of Commerce  
Royal Society for the Protection of Birds (RSPB)  
RWE npower (Fawley Power Station)  
Sandy Balls Estate  
The Showmen's Guild of Great Britain  
Solent Forum  
Solent Protection Society  
Somerley Estate  
Southampton Airport  
Scottish and Southern Electricity  
The Caravan Club Ltd  
Tourism South East  
Wilts & Dorset Bus Co Ltd  
Wiltshire Association of Local Councils  
Wiltshire Fire & Rescue  
Wiltshire Wildlife Trust  
UK Youth

## **Annex 2 – List of groups and organisations consulted on the Regulation 19 Submission draft Local Plan (January – February 2018)**

Coal Authority  
 Historic England  
 Natural England  
 Natural England  
 Environment Agency  
 Marine Management Organisation  
 Highways England  
 National Grid  
 Bournemouth Water  
 Wessex Water  
 Southern Water  
 West Hampshire Clinical Commissioning Group  
 NHS England

Coal Authority  
 Historic England

Natural England  
 Natural England  
 Environment Agency  
 Marine Management Organisation  
 Highways England  
 Utilities

West Hampshire Clinical Commissioning Group  
 NHS England

Dorset County Council  
 Southampton City Council  
 Christchurch Borough Council  
 East Dorset District Council  
 Wiltshire Council  
 Hampshire County Council  
 New Forest District Council  
 Test Valley Borough Council

Sir Desmond Swayne MP  
 Dr Julian Lewis MP  
 Sir Christopher Chope MP  
 John Glen MP  
 Caroline Nokes MP

Ashurst & Colbury Parish Council  
 Beaulieu Parish Council  
 Boldre Parish Council  
 Bramshaw Parish Council

Bransgore Parish Council  
 Breamore Parish Council  
 Brockenhurst Parish Council  
 Burley Parish Council  
 Copythorne Parish Council  
 Denny Lodge Parish Council  
 East Boldre Parish Council  
 Ellingham, Harbridge & Ibsley Parish Council  
 Exbury & Lepe Parish Council  
 Fawley Parish Council  
 Fordingbridge Town Council  
 Godshill Parish Council  
 Hale Parish Council  
 Hordle Parish Council  
 Hyde Parish Council  
 Hythe & Dibden Parish Council  
 Landford Parish Council  
 Lymington & Pennington Town Council  
 Lyndhurst Parish Council  
 Marchwood Parish Council  
 Melchet Park & Plaitford Parish Council  
 Milford on Sea Parish Council  
 Minstead Parish Council  
 Netley Marsh Parish Council  
 New Milton Town Council  
 Redlynch Parish Council  
 Ringwood Town Council  
 Sopley Parish Council  
 Sway Parish Council  
 Totton & Eling Town Council  
 Wellow Parish Council  
 Whiteparish Parish Council  
 Woodgreen Parish Council

Action Hampshire  
 Age Concern Hampshire  
 Associated British Ports  
 Beaulieu Estate  
 Bournemouth International Airport Ltd  
 Cadland Estate  
 Calshot Activities Centre  
 Calshot Residents' Association  
 Campaign for National Parks  
 Christchurch Bicycle Club  
 Community First New Forest  
 Country Land and Business Association  
 Country Land and Business Association  
 Cranborne Chase & West Wilts Downs AONB

Enterprise M3 LEP  
 Exbury Estate  
 ExxonMobil Chemical Ltd  
 Federation of Small Businesses  
 Friends, Families and Travellers  
 Fordingbridge Society  
 Forestry Commission  
 Friends of Brockenhurst  
 Friends of Brockenhurst  
 Friends of the New Forest  
 Hampshire Chamber of Commerce  
 Hampshire and Isle of Wight Wildlife Trust  
 Hampshire and Isle of Wight Wildlife Trust  
 Hampshire Association of Local Councils  
 Hampshire Field Club & Archaeological Society  
 Hampshire Fire & Rescue Service (New Forest Group)  
 Hampshire Gardens Trust  
 Hampshire Outdoor Centres  
 Hampshire Scouts  
 Hamptworth Estate  
 The Hamptworth Estate Office  
 Homes and Communities Agency  
 Lepe Country Park  
 Lymington & District Chamber of Commerce & Industry Limited  
 Lymington Harbour Commissioners  
 Lymington Society  
 Jackson Planning  
 Meyrick Estate  
 National Farmers' Union  
 National Farmers' Union  
 National Grid  
 National Trust  
 National Trust  
 Network Rail  
 New Forest Access for All  
 New Forest Access Forum  
 New Forest Association of Local Councils  
 New Forest Business Partnership  
 New Forest Centre  
 New Forest Commoners' Defence Association

New Forest Equestrian Association  
 New Forest Friends of the Earth  
 New Forest Hounds  
 New Forest Runners Club  
 New Forest Sports Council  
 New Forest Tourism Association  
 New Forest Transition  
 New Forest Trust  
 Pylewell Estate  
 Ramblers Association (New Forest Branch)  
 Ringwood Chamber of Commerce  
 Royal Society for the Protection of Birds (RSPB)  
 Sandy Balls Estate  
 Sandy Balls Holiday Village  
 The Showmen's Guild of Great Britain Central Office  
 The Showmen's Guild of Great Britain Western Office  
 Solent Forum  
 Solent LEP  
 Solent Protection Society  
 Somerley Estate  
 Southampton Airport  
 SSE  
 Swindon & Wiltshire LEP  
 The Caravan Club Ltd  
 Tourism South East  
 Verderers of the New Forest  
 Wilts & Dorset Bus Co Ltd  
 Wiltshire Association of Local Councils  
 Wiltshire Fire & Rescue  
 Wiltshire Wildlife Trust  
 UK Youth  
  
 Cadland Estate  
 Bisterne, Pylewell & Sowley Estates  
 Exbury Estate  
 Somerley Estate  
 Hamptworth Estate  
 Beaulieu Estate  
 Hinton Admiral Estate