



PLANNING and TRANSPORT COMMITTEE

Reply to: -

Sent as attachment to Email to bankssolutionsuk@gmail.com only

10 September 2018

Kevin Ward and Caroline Mulloy
The Planning Inspectorate
Temple Quay House
2 The Square, Temple Quay
Bristol BS1 6PN

Dear Mr Ward and Ms Mulloy,

**Independent Examination of the New Forest National Park Local Plan
Inspectors' Matters, Issues and Questions for Examination
NEW FOREST ASSOCIATION RESPONSE TO QUESTIONS**

Response by New Forest National Park Authority (NFNPA) in answer to Inspectors' initial questions

NFNPA's acceptance that post-consultation amendments were not minor raises the question of whether Members approval for the submitted plan exists.

NFNPA's Housing Trajectory (as at 31 March 2018) on page 27 of their response is in conflict with the plans of Fawley Waterside (FW) as contained in their latest document - "Our Vision" issued in July 2018. The phasing plan it contains (page 26) states that 100 residential units of sector 7, roughly corresponding to land within the National Park, will be completed between 2029 and 2035. The FW document is available at <http://future.fawleywaterside.co.uk/publications/> and is described as *Summer Public Exhibitions Brochure*.

For information, FW have included the Calshot development in this brochure. The land is owned by New Forest District Council, (although it is understood FW are seeking ownership), and is treated as a separate matter by NFNPA. The build phasing of this sector in FW's plan is "To be determined".

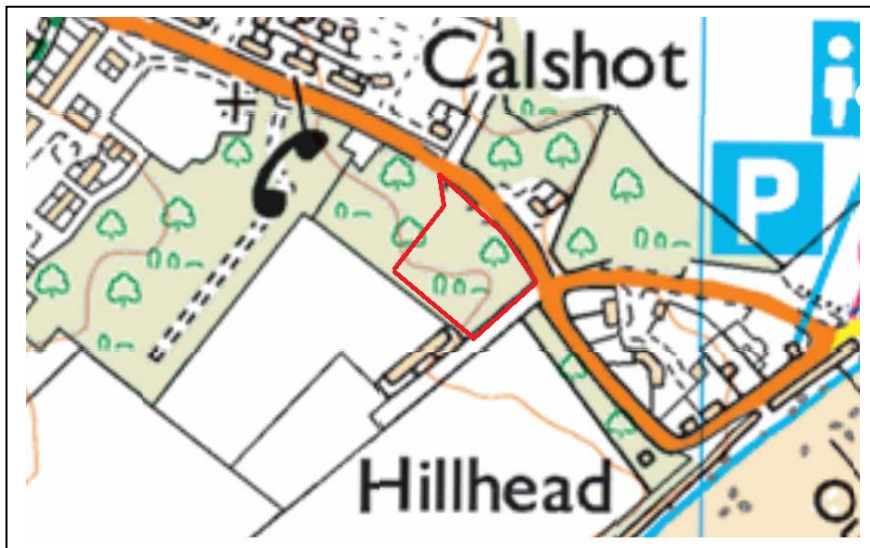
NFA Response to Inspectors' Matters, Issues and Questions for Examination

2.2 The differing timetables of the plans of the NFNPA and New Forest District Council (NFDC) affect this matter. Following NFDC's rejection of its initial Objectively Assessed Need for housing (OAN) and acceptance of a new OAN, it has belatedly concluded that it can achieve its full OAN quota. Up until the issue of its plan for consultation (29 June 2018), it had not been sensible to ask NFDC to accept any of NFNPA's OAN as it was achieving only around 70% of its own.

4.07 NFA does not know if differences identified by Silcock between national parks as a whole, the New Forest National Park and other areas are relevant and have been fully taken into account in the preparation of the submitted plan. Notable differences are -

National parks have a higher proportion of self-employed people than the country as a whole (19% compared to 10%); house sale prices in the New Forest National Park are 74% above its region's average; and, while 32% of Forest people being classified as economically inactive is close to the national average, 22% of those were retired compared to 19% in all English national parks and only 14% for England as a whole. (Source: Silcock et al., 2013, Table 2.5, Table A1.41).

4.14 In view of subsequent events in the Calshot area, it is difficult to accept NFNPA's rejection of the "Flying Boat" site at Calshot when offered in its call for sites. Roughly outlined in red below, it is brownfield¹, as opposed to the now designated Calshot site and is of size commensurate with NFNPA's Spatial Strategy (4.15).



4.17 The 400m restriction on the allocation of housing in relation to the Special Protection Areas (SPA) has existed for some time, and has been validated, around England's other lowland heath SPAs. The argument against its introduction around the New Forest SPA is that the area is less fragmented. However NFA have argued that the differing approach may not conform to European directives and that in any case the unique policy of distributing car parks and camp sites throughout the New Foorest SPA negates the fragmentation argument. This is illustrated by Ashby's unpublished 2017 mapping work *Distribution of New Forest Car Parks and Campsites* which attached to this response.

¹ Barrister's opinion available on request.

5.2 The ecological value of the New Forest National Park is declining and the primary cause is recreational pressure from residents and visitors. The NFNPA apparently accepted this premise when it commissioned *Liley, D. & Lake, S. (2015) Research recommendations relating to impacts of recreation on ground-nesting birds in the New Forest National Park. Unpublished report by Footprint Ecology for the New Forest National Park Authority*. The submission document lacks a specific policy to promote enhancement of the protected areas. NFNPA gained notoriety when it refused, against all professional advice, an application from the Forestry Commission's to restore a large area to wetland.²

7.2 Inspectors should be aware of the meaning of the phrase *parishes in the National Park* contained in SP20. NFA understands this to mean parishes being entirely or partly within the National Park. Around 150,000 persons rather than the park population of 35,000.

10.9 FW have updated their plans as referenced in second paragraph above. These differ from the previous plan in that Calshot chimney is to be replaced by a building visible from both West and East Solent, and therefore significantly higher than the existing power station building. Another tall structure, the *crystal tower*, has appeared.

Developments at the Fawley Power Station may also be gleaned from NFDC's Local Plan Review 2016-2036 Part One: Planning Strategy SUBMISSION DOCUMENT FOR REGULATION 19 PUBLIC CONSULTATION released on 29 June 2018. It states for instance at 9.65 *The allocation site is also suitable for stand-alone redevelopment with a proportionate reduction in development capacity to accommodate sufficient public open space and natural recreational greenspace on-site.*

And at Strategic site 4: The former Fawley Power Station section "i" first bullet point.

- *Around 1,380 new homes dependent on the form, size and mix of housing provided.*

NFA contends that the likelihood of taller buildings undermines the landscape case NFNPA promotes. The statement regarding alternative suitability and the clearly fluid nature of the plans further invalidates the viability report that concluded viability was only possible with a major development in a National Park of exactly 120 dwellings of a defined size mix.

11.5 During the informal consultations on this plan, NFNPA has been encouraged to pursue other potential sources of supply in the form of publically owned under utilised development sites within or adjacent to defined villages. Examples are Ashurst Hospital, the disused sidings at Brockenhurst, the Brockenhurst College car park area and fire brigade forecourts.

14.1 The Local Plan suggests NFNPA has given inadequate consideration to the effects of surrounding development on the National Park. NFDC and Christchurch DC are planning large developments on the borders of the southern edge of the National Park.

² Application NFNPA 16/00571 Wetland restoration comprising the restoration of meanders, bed level raising (including the main... PART OF THE CATCHMENT AREA OF THE LATCHMORE BROOK INCLUDING STUDLEY WOOD, ISLANDS THORNS INCLOSURE, AMBERWOOD INCLOSURE, ALDERHILL INCLOSURE, SLODENS INCLOSURE AND LATCHMORE BOTTOM. CENTRAL GRID REFERENCE SU 2121113830

For instance the briefest of analyses of FW's latest plans for 1380 dwellings, 10 hectares of business/industry including 16,000 sqm of B1 office results in the following traffic generation. Using industry standard generation rates, the development will result in 14,000 journeys per day. Traffic will go north to or via the Waterside parishes (pop 60,000) to Southampton or West to or via the Solent parishes (pop 70,000) to Bournemouth/Poole built up area. Journey times to Totton and Lymington are similar. While a small percentage of journeys will remain on site, there is no reason to suppose that less than 20% of the generated traffic (2,800) will use the road to Hill Top, the B3054 to Beaulieu and on to Lymington (B3054), Brockenhurst (B3055) or Lyndhurst (B3056).

New Forest National Park Tranquil Areas Mapping (March 2014, revised 2015) used a step technique to determine the effect of traffic flow on tranquillity. Actual traffic counts are not available to NFA, but it is quite likely the category of more than one of the Forest roads will change with a measurable detrimental effect on some of the most tranquil areas of the Forest. The map and relevant page of the report, reference <http://www.newforestnpa.gov.uk/app/uploads/2018/05/New-Forest-National-Park-Tranquil-Area-Mapping-Report-March-2015-FINAL2.pdf> are attached.

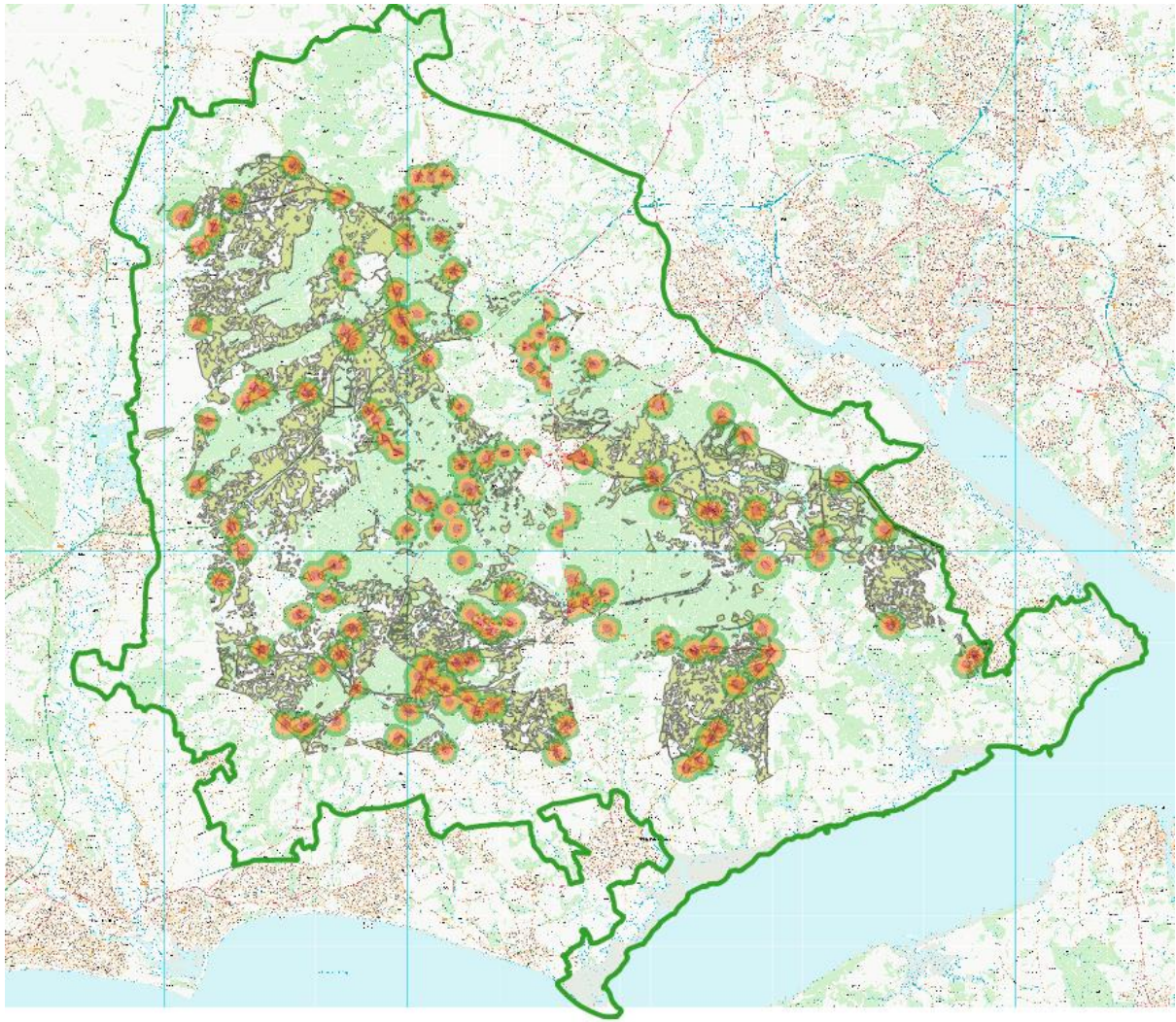
The reference to tranquillity at NPPF 180b are noted and NFA believes policy should exist to compel NFNPA to take the initiative in this multi authority problem.

Yours sincerely,



Graham Baker, NFA Planning Committee
Registered Charity 260328

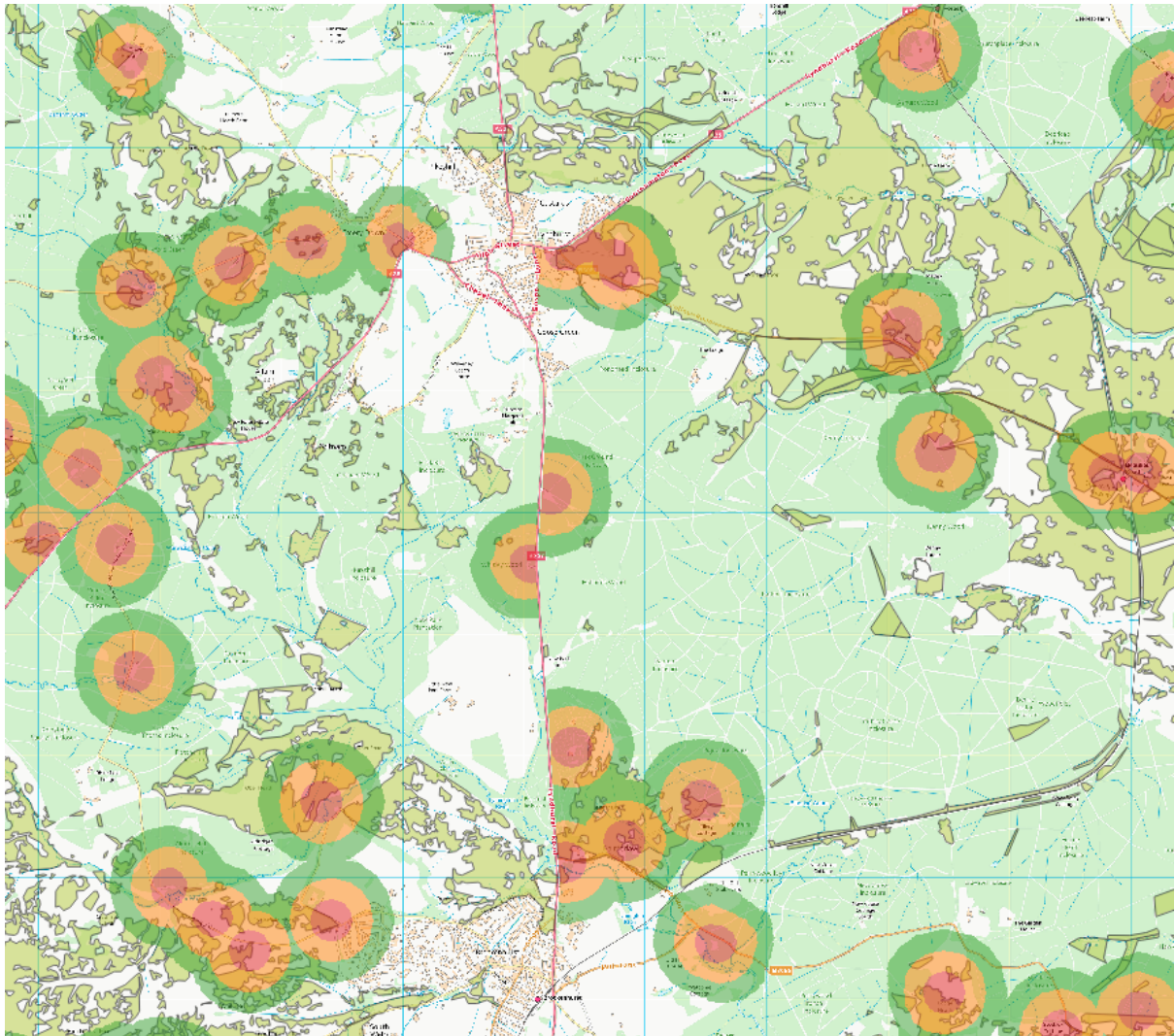
Distribution of New Forest Car Parks and Campsites



Concentric circles represent penetration from Forestry Commission car parks and campsites. The green circle has a diameter of about 0.9km.

The highlighted areas within the park boundary are areas of lowland heath.

Area around Whiteley Wood



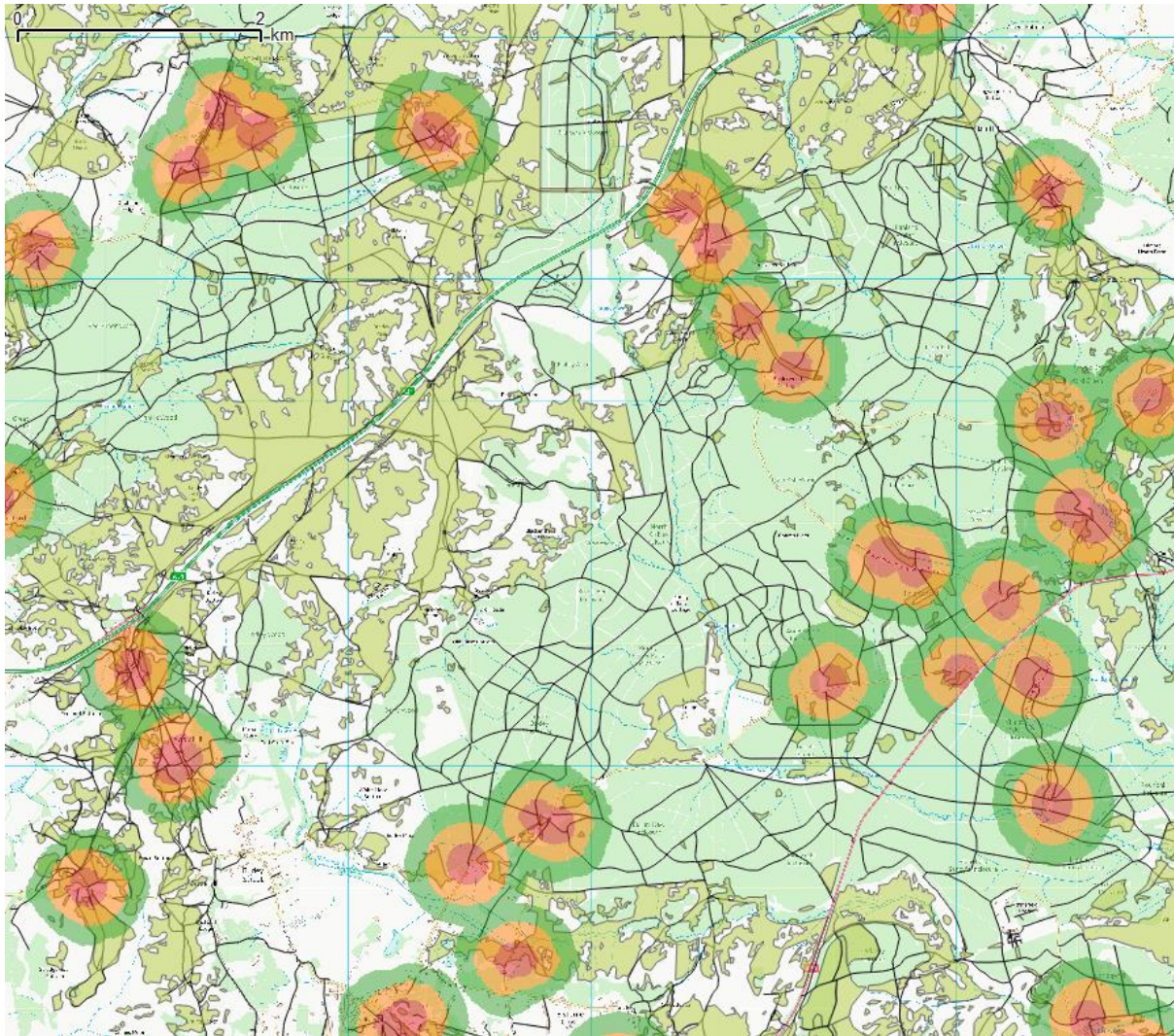
Shows penetration from car parks if people (or their dogs) travel in any direction equally as easily, however crossing of fenced roads is not allowed.

Area around Whiteley Wood



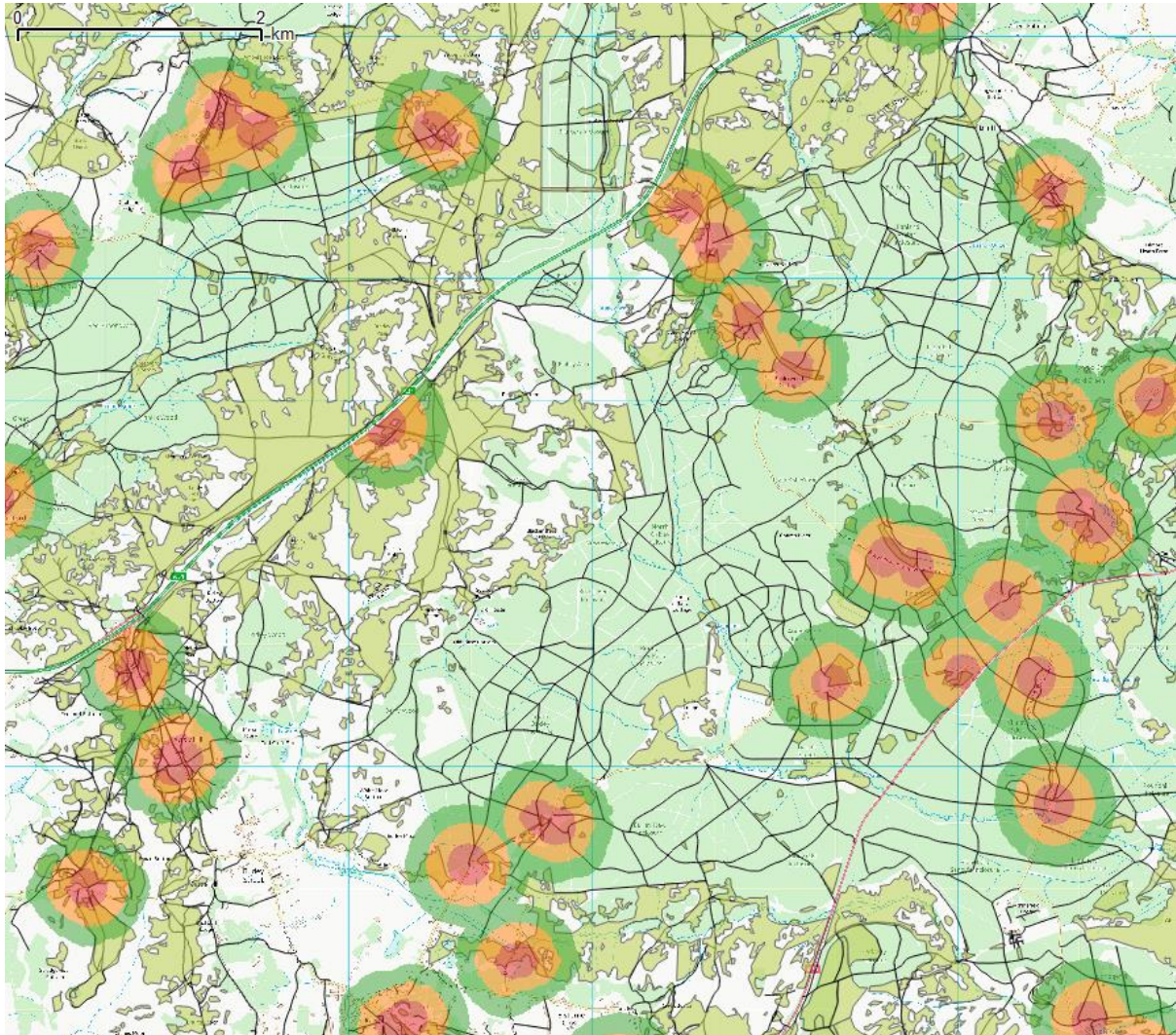
This is the same conditions as the previous page, but the effect of people using footpaths is included. It is assumed that people travel faster on a footpath. In the resulting map the coloured bands represent the distance travelled using the same amount of effort required to produce concentric circle on the previous map. Penetration is greater along the line of a footpath.

Area around site of proposed Car Park on A31 (OS 421300, 107800)



With proposed Car Park on A31

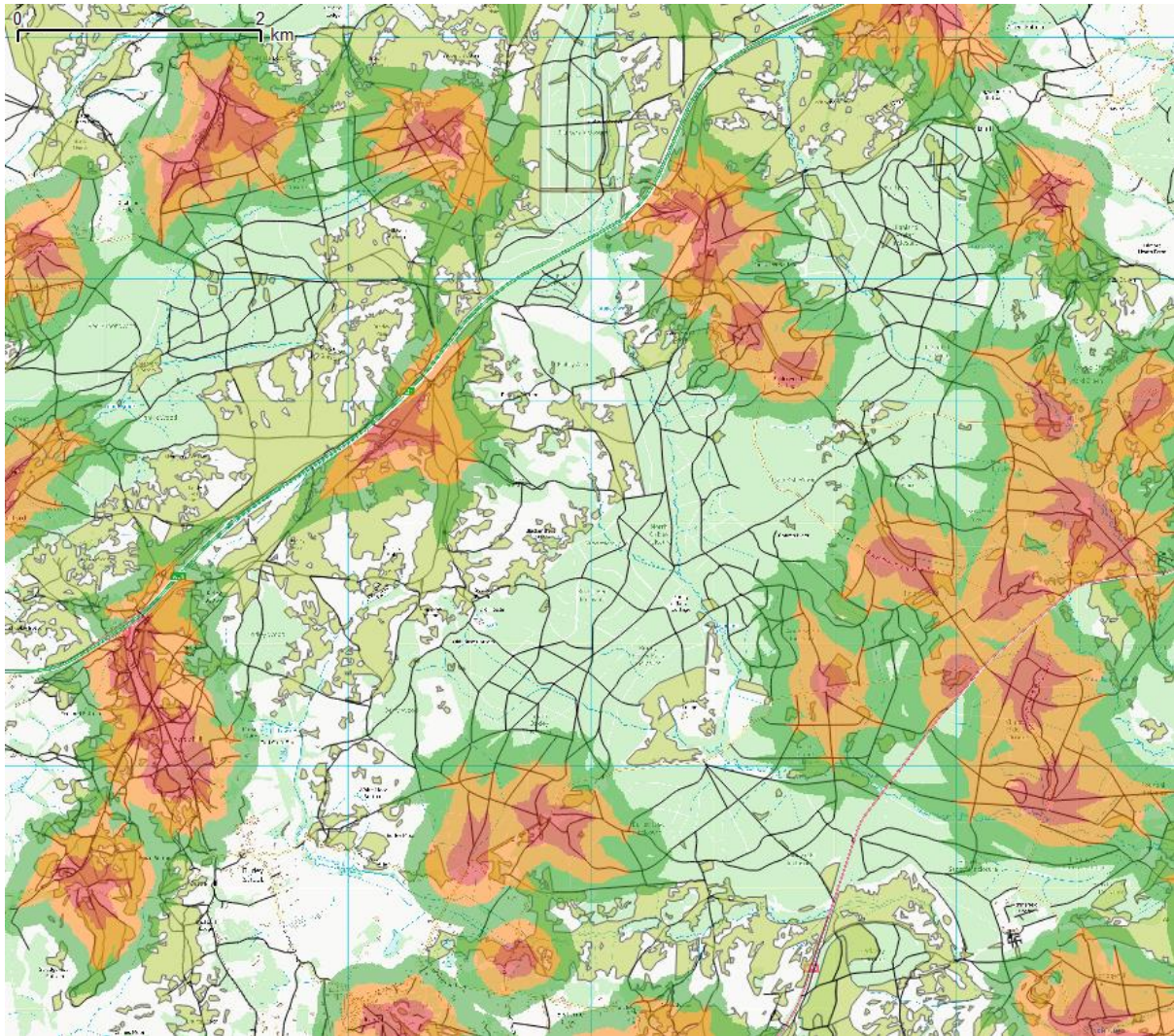
(OS 421300, 107800)



Ignoring the effect of paths

With proposed Car Park on A31

(OS 421300, 107800)



With the effect of paths included. According to the map data there is an underpass under the A31 near to the proposed car park. This leads to some penetration of the forest to the north of the A31 as well.

Footnote

The differential rate of travel on paths and forest can easily be adjusted if there is some data to support it. This will change the distance travelled along the paths and the area of disturbance to the sides of the path.

Other terrains with different frictions, could also be added, e.g. woodland, water, agricultural land.

In the calculation of the distance travelled is adjusted for the steepness of the terrain, this effect is small but may cause some apparent anomalies.

Just for (my) reference:

Topology reclassification rules:

0 thru 2 = 2

2 thru 5 = 4

5 thru 10 = 8

10 thru 20 = 16

20 thru 30 = 32

30 thru 40 = 8

40 thru 50 = 128

50 thru 60 = 256

60 thru 100 = 512

Friction reclassification rules:

1 = 1 Path

5 = 5 Forest

9 = 90000 Railways and Fenced Roads

New Forest National Park
Tranquil Areas Mapping
2015

Figure 1.1

1996 Tranquil Areas Map



Map Scale @ A3:1:170,000

New Forest National Park

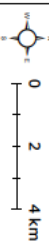
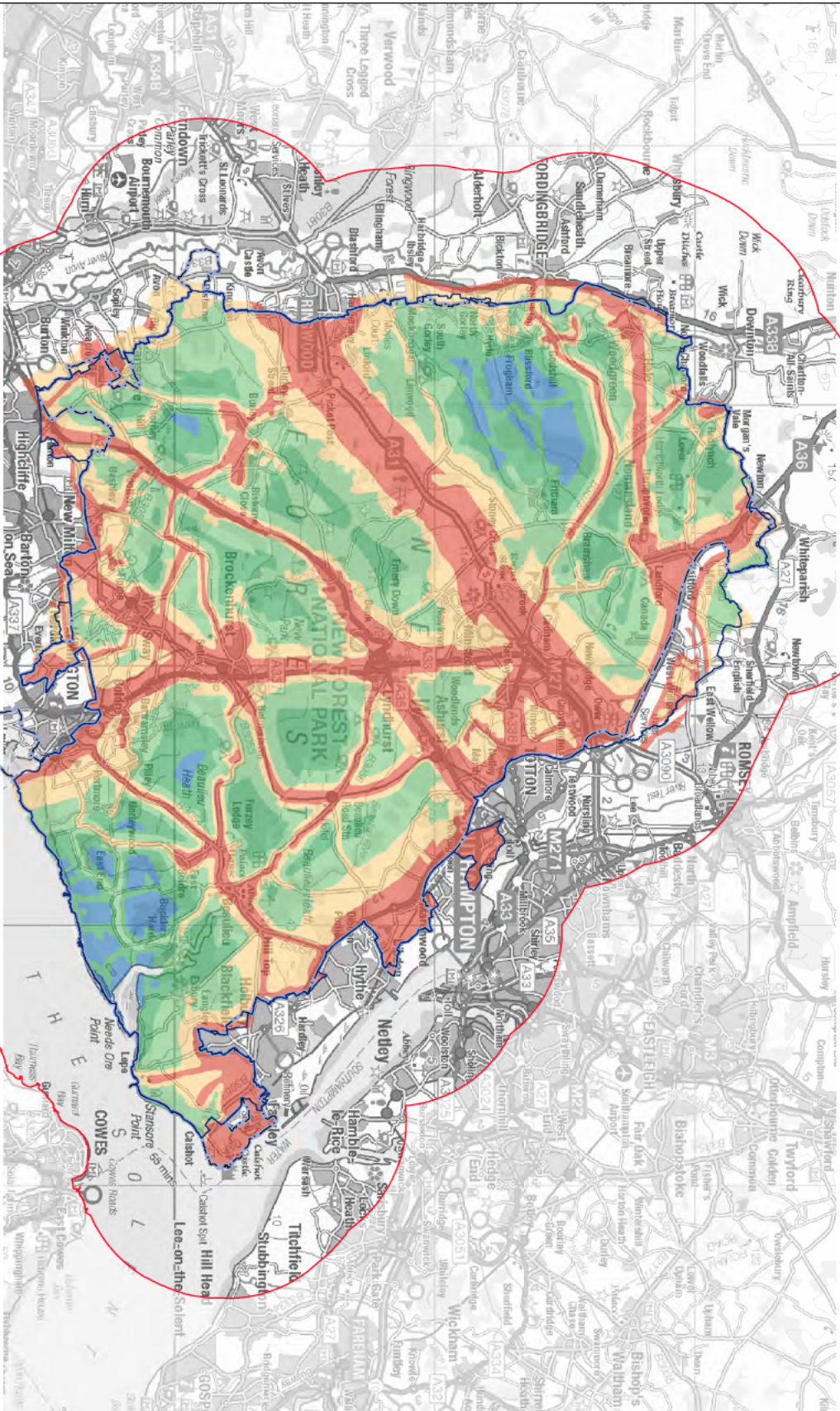


Table 2.3: Roads – distance buffers (2015)

Category	Example of where measurement on map is derived	Distance threshold (regional mapping)	Level A	Level B	Level C	Level D	Level E
Over 75,000	N/A No roads within study have this level of traffic	3km	3km (beyond NFNP boundary)				
25,000 – 75,000 (very high)*	A31 in 1996 had AADF > 25,000. It is generally mapped (with exceptions) as Zone A – 1km buffer, Zone B, 1km buffer. <i>A31 in 2000 had c. 51k AADT, therefore likely to be in 'very high' category)</i>	2km	1000m	1750m	2500m	3500m	
10,000 – 25,000 (high)	A36 in 1996 had AADF of 10-25k	1km	500m	1000m	1500m	3000m	
5,000 – 10,000 (med)	Section of B3055 in 1996 had AADF of 5-10k	500m	250m	500m	1500m	2000m	
2,000- 5,000 (low)	B3058 in 1996 had AADF of 2-5k	no disturbance	100m	200m	500m	1500m	
800-2,000 (very low – suitable for cycling)	In many areas of the map this category does not appear to have an impact - measurement taken from the area around St Leonards Rd near East End.	(new category)	0m	100m	200m	300m	
200-800 (walkable – uncomfortable)	In many areas of the map this category does not appear to have an impact - measurement taken from the area around St Leonards Rd near East End.		0m	0m	100m	200m	