

# Sustainability Appraisal (SA) for the New Milton Neighbourhood Plan

SA Report to accompany the submission version of the Neighbourhood Plan

New Milton Neighbourhood Plan Working Group

May 2019

#### Quality information

Prepared by	Checked by	Approved by
Rosie Cox	Nick Chisholm-Batten	Nick Chisholm-Batten
Assistant Consultant	Associate Director	Associate Director

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#### Prepared for:

New Milton Town Council

Prepared by:

AECOM Infrastructure & Environment UK Limited 3rd Floor, Portwall Place Portwall Lane Bristol BS1 6NA United Kingdom

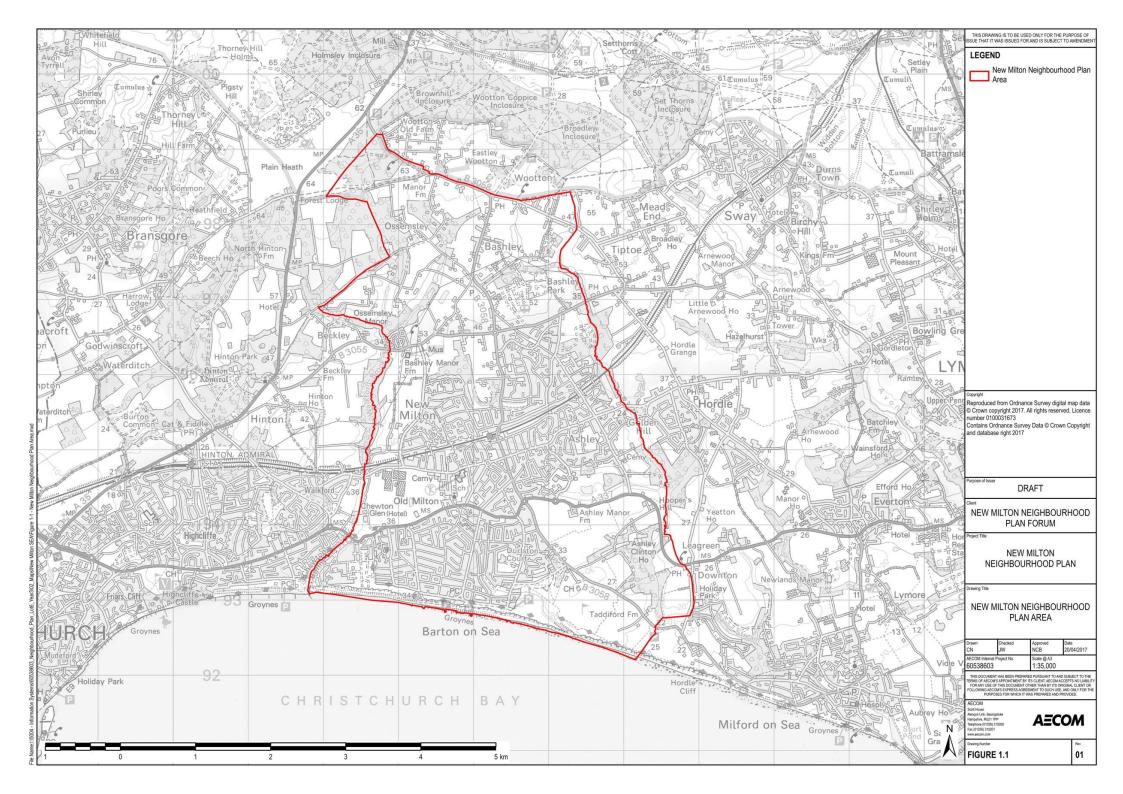
T: +44 117 901 7000 aecom.com

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# **Non-Technical Summary**

# What is a Sustainability Appraisal?

A sustainability appraisal (SA) has been undertaken to inform the New Milton Neighbourhood Plan (NMNP). This process is required by the Strategic Environmental Assessment Regulations.

Neighbourhood Plan groups use SA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the New Milton Neighbourhood Plan?

The NMNP presents a plan for the administrative area of New Milton parish for the period to 2036. Prepared to be in conformity with the current and emerging Local Plan for the New Forest district, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including the rejuvenating New Milton town centre, supporting a more balanced population, protecting and enhancing the natural environment, and improving townscape quality and the quality of the public realm.

It is currently anticipated that the NMNP will undergo referendum later in 2019.

## **Purpose of this SA Report**

This SA Report, which accompanies the submission version of the NMNP, is the latest document to be produced as part of the SA process. The first document was the SA Scoping Report (June 2017), which includes information about the Neighbourhood Plan area's environment and community. The second document was the SA Report which accompanied Regulation 14 consultation on the Neighbourhood Plan in spring 2019.

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the NMNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SA process which has been carried out to date.

The SA Report contains:

- An outline of the contents and main objectives of the NMNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SA Framework of objectives against which the NMNP has been assessed;
- The appraisal of alternative approaches for the NMNP;
- The likely significant environmental effects of the NMNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the NMNP; and
- The next steps for the NMNP and accompanying SA process.

### Assessment of alternative approaches for the NMNP

A key aim of the Neighbourhood Plan is to ensure that development delivered in the Neighbourhood Plan area is appropriately located for local needs.

The Neighbourhood Plan has been prepared in conjunction with the provisions of the current and emerging New Forest District Local Plan. This incorporates the release of Green Belt land in two locations for a total of 290 homes (SS10 Brockhills Lane and SS11 South of Gore Road) and a need for an additional 200 homes to be planned for by the NMNP.

To support the development of a spatial strategy to deliver these indicative numbers, the Neighbourhood Plan Working Group was keen to consider alternative locations for delivering housing in the Neighbourhood Plan area. In light of this, the Neighbourhood Plan Steering Group considered where broadly in the parish such development should go.

To support decision making on this element of the plan, the SA process has considered two sets of options, with a view to exploring the sustainability implications of delivering housing in alternative locations in the Neighbourhood Plan area.

The first set of options explored the sustainability implications of delivering housing in alternative broad locations in the parish. Corresponding with the two principal settlements of the Neighbourhood Plan area, the options considered were as follows:

- Option 1: Facilitate the delivery of homes through the Neighbourhood Plan through a focus on New Milton
- Option 2: Facilitate the delivery of homes through the Neighbourhood Plan through a focus on Barton-on-Sea
- Option 3: Facilitate the delivery of homes through the Neighbourhood Plan in locations outside of New Milton and Barton-on-Sea

The second set of options sought to consider whether the Neighbourhood Plan should focus development on existing previously developed 'brownfield' sites in New Milton or widen the scope of the Neighbourhood Plan to consider development on previously undeveloped 'greenfield' sites in the vicinity of New Milton. This was with a view to delivering allocations for the remaining 200 homes as required by NFDC. The two options considered were as follows:

- **Option 1:** Facilitate the development of greenfield sites around New Milton
- **Option 2:** Focus development on previously developed sites in New Milton

These two sets of options were then appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). The findings of the appraisal are presented in Table 4.1 and Table 4.2 in the main body of the SA Report.

The current Neighbourhood Plan allocates land for in the region of 250 homes to meet the remaining housing requirement for the Neighbourhood Plan area. These allocations are on previously developed sites, including the available brownfield sites located in the town centre and previously developed land associated with the former minerals workings at Caird Avenue. These are in addition to the sites proposed to be allocated in the vicinity of New Milton through the New Forest Local Plan Review (i.e. Land East of Brockhills Lane and Land South of Gore Road).

In addition, previously developed land associated with the former minerals workings at Caird Avenue has been allocated for mixed-use development comprising business and food retail uses and green infrastructure. A cultural/arts hub, a health and wellbeing centre and an innovation/business centre have also been allocated on further previously developed town centre sites.

The choice of these sites reflects the findings of evidence base studies undertaken for the NMNP and the outcomes of Neighbourhood Plan community consultation. This highlighted that there is a strong desire within the community to rejuvenate underutilised parts of the town centre and improve its offer and vitality. This is coupled with a desire to enhance the quality of the public realm and townscape within the town, and protect landscape character in the wider Neighbourhood Plan area.

### Assessment of the current version of the NMNP

The submission version of the NMNP presents 19 planning policies for guiding development in the Neighbourhood Plan area.

Utilising the SA Framework of objectives and assessment questions developed during the earlier scoping stage of the SA, the SA process has assessed the policies put forward through the current version of the NMNP. The SA Report has presented the findings of the assessment under the following SA themes:

_	Air Quality	_	Land, Soil and Water Resources
_	Biodiversity and Geodiversity;	_	Population and Community;
_	Climate Change;	_	Health and Wellbeing; and
_	Landscape and Historic Environment;	_	Transportation

The assessment has concluded that the current version of the NMNP is likely to lead to **significant long term positive effects** in relation to the 'Population and Community', and 'Transportation' SA themes. These benefits largely relate to the NMNP's focus on enhancing the quality of life of residents through the regeneration of the town centre, seeking to deliver a range of housing types and tenures, including prioritising housing to attract a younger demographic profile, and improving accessibility to enhanced services and facilities. The NMNP will further support accessibility for residents and visitors through the protection and enhancement of green infrastructure networks in the Neighbourhood Plan area, an expansion of high quality local pedestrian/cycle networks, and enhancements to the public realm.

The NMNP plans positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, with particular focus placed on the European and national designations in the New Forest. In addition to supporting the natural environment, this will have benefits for residents and the visitor economy. In relation to the Neighbourhood Plan allocations at the Land at Caird Avenue and in the town centre, it is expected that potential effects will be mitigated through the detailed design provisions identified through Policy NM3 (Land at Caird Avenue) and other relevant policies identified within the NMNP. These set out a range of provisions for facilitating biodiversity enhancements. In relation to the Local Plan Review allocations in the Neighbourhood Plan area, the NMNP provides additional provisions for protecting and enhancing ecological networks in these areas. As such overall long term **minor positive effects** in relation to the Biodiversity SA theme are anticipated as a result of the Neighbourhood Plan.

It is recognised that improvements in green infrastructure networks and ecological networks through the NMNP will lead to indirect **positive effects** on the 'Climate Change' and 'Land, Soil and Water' SA themes, through effective water management, pollution and climate control.

The NMNP has the potential to lead to residual **positive effects** in relation to the 'landscape and historic environment' SA theme. Whilst it is recognised that the strategic site allocations may lead to adverse effects upon the setting of the New Forest National Park, it is anticipated that these elements will be considered through the Local Plan Review, including its accompanying SA process, and mitigation measures delivered. In the case of Land at Caird Avenue, it is expected that adverse effects have the potential to be mitigated through the detailed masterplanning proposed through Policy NM3. It is also recognised that the Neighbourhood Plan policies' focus on the protection of landscape character and local distinctiveness may further address adverse effects where they may arise, and secure enhancements. A further key element in relation to this SA theme is that the redevelopment of underutilised sites in New Milton town centre has significant potential to lead to enhancements in the quality of the public realm, townscape character and local distinctiveness in the town centre.

### Next steps

The NMNP (accompanied by this SA Report) has been submitted to New Forest District Council and the New Forest National Park Authority for subsequent Independent Examination. At Independent Examination it will be considered whether the plan is meets the 'basic conditions' for Neighbourhood Plans and is in general conformity with the emerging Local Plans.

If Independent Examination is favourable, the NMNP will be subject to a referendum, organised by New Milton Town Council and New Forest District Council. If more than 50% of those who vote agree with the NMNP, then the Neighbourhood Plan will be 'made'. Once made, the NMNP will become part of the Development Plan for New Milton parish.

# **1. Introduction**

# Background

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal in support of New Milton's emerging Neighbourhood Plan.
- 1.2 The New Milton Neighbourhood Plan (NMNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The New Milton Neighbourhood Plan is being prepared in the context of the existing and emerging Local Plans for New Forest district and the New Forest National Park.
- 1.3 The New Milton Neighbourhood Plan has been submitted, with this SA Report, to New Forest District Council and the New Forest National Park Authority for subsequent independent examination.
- 1.4 Key information relating to the New Milton Neighbourhood Plan is presented in **Table 1.1**.

#### Table 1.1: Key facts relating to New Milton Neighbourhood Plan

Name of Responsible Authority	New Milton Town Council
Title of Plan	New Milton Neighbourhood Plan
Subject	Neighbourhood Plan
Purpose	The New Milton Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the existing and emerging Local Plans for New Forest district and the New Forest National Park.
	The Neighbourhood Plan will be used to guide and shape development within the New Milton Neighbourhood Plan area.
Timescale	То 2036
Area covered by the plan	The Neighbourhood Plan area covers the parish of New Milton in Hampshire ( <b>Figure 1.1</b> ).
Summary of content	The New Milton Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Graham Flexman
	Town Clerk
	New Milton Town Council
	Email: <a href="mailto:clerk@newmiltontowncouncil.gov.uk">clerk@newmiltontowncouncil.gov.uk</a>
	Tel: 01425 619120

# Sustainability Appraisal (SA) explained

- 1.5 SA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SA for the NMNP seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>1</sup>. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans; however a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required.
- 1.7 The NMNP has been screened in by New Forest District Council and the New Forest National Park Authority as requiring a Strategic Environmental Assessment (SA). To meet this requirement, the NMNP is undergoing an SA process which incorporates the requirements of the SA Directive. This mirrors the approach currently being taken for the emerging New Forest District Local Plan Review, and reflects the significant socio-economic issues which the Neighbourhood Plan seeks to address.
- 1.8 The SA has been undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
  - When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
  - 2) A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft New Milton Neighbourhood Plan) that presents outcomes from the SA (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 This SA Report therefore addresses the requirements of 2) above. Chapter 4 discusses the scope of the SA process.

## Structure of this SA Report

- 1.11 This document is the SA Report for the NMNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.
- 1.12 Each of the four questions is answered in turn within this report, as follows:

<sup>&</sup>lt;sup>1</sup> Directive 2001/42/EC

SA Report question		In line with the SEA Regulations, the report must include <sup>3</sup>
	What is the plan seeking to achieve?	<ul> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What is the sustainability 'context'?	<ul> <li>The relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What's the scope of the SA?		<ul> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What are the key issues & objectives?	• Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SA involved up to this point?		<ul> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach inlight of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
What are the assessment findings at this stage?		<ul> <li>The likely significant effects associated with the Submission version of the plan</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Submission version of the plan</li> </ul>
What happens next?		• The next steps for plan making/SA process.

#### Table 1.2: Questions that must be answered by the SA Report in order to meet regulatory<sup>2</sup> requirements

<sup>&</sup>lt;sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004 <sup>3</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

# 2. Local Plan context and vision for the NMNP

### Local Plan context for the NMNP

- 2.1 The NMNP is being prepared in the context of the existing and emerging Local Plans for New Forest district and the New Forest National Park.
- 2.2 The current 'New Forest District Local Plan<sup>4</sup> is split into two parts: Part 1: 'The Core Strategy' was adopted in October 2009 and Part 2: 'Sites and Development Management' was adopted in April 2014. Part 1 of the Local Plan sets out the strategic policies and objectives for all areas of the district which are outside of the New Forest National Park boundaries, up until the year 2026, with Part 2 outlining the detailed proposals required to implement the planning strategy<sup>5</sup>. In order to ensure that the planning polices for the district were fully in-line with the National Planning Policy Framework, the district are in the process of completing a review of the Local Plan. In this context, the 'Local Plan Review 2016-2036 Part 1: Planning Strategy'<sup>6</sup> was published in July 2016, outlining the initial proposals for public consultation.
- 2.3 Given the National Planning Policy Framework was published shortly before the *Local Plan Part 2: Sites and Development Management* was finalised and submitted for examination, New Forest District Council have committed to undertake an early review of the Local Plan. As such the preparation of the *Local Plan Part One: Strategy and Strategic Allocations* is underway and will update and replace the *Local Plan Part 1: Core Strategy* and a small number of strategic or cross-cutting policies in the Local Plan Part 2. Part One of the revised Local Plan will include strategic allocations for new development, generally sites for 100 or more homes or employment/commercial uses of five or more hectares. It is important to note that the current New Forest Local Plan: Core Strategy will remain as the main development plan document for the district until the emerging Local Plan is adopted.
- 2.4 New Forest District Council submitted the *Local Plan 2016-2036 Part 1: Planning Strategy* for examination in November 2018.
- 2.5 The key provisions of the emerging Local Plan Review relating to the New Milton Neighbourhood Plan area<sup>7</sup> are as follows:
  - The release of Green Belt land in two locations for a total of 290 homes (SS10 Brockhills Lane and SS11 South of Gore Road)
  - The need for either the saving of the Local Plan Part 2 sites policies or their replacement and/or addition by the Neighbourhood Plan (including 54 homes on Land east of Caird Avenue)
  - The need for an additional 200 homes to be planned for by the New Milton Neighbourhood Plan
  - All open market housing on developments of 100 homes or more to include provision of at least three non-standard types/tenures
  - 50% affordable housing to be delivered in the coastal areas of the District

<sup>&</sup>lt;sup>4</sup> New Forest District Council (2018): 'New Forest District Local Plan Part 1: Core Strategy', [online] available to download via: <<u>http://www.newforest.gov.uk/corestrategy</u>> last accessed [02/03/18]

<sup>&</sup>lt;sup>5</sup> New Forest District Council (2018): 'Local Plan Part 2: Sites and Development Management', [online] available to download via: <a href="http://www.newforest.gov.uk/article/14184/Local-Plan-Part-2-Sites-and-Development-Management">http://www.newforest.gov.uk/article/14184/Local-Plan-Part-2-Sites-and-Development-Management</a>> last accessed [02/03/18]

<sup>&</sup>lt;sup>6</sup> New Forest District Council (2018): 'Local Plan Review 2016-2036', [online] available to download via:

<sup>&</sup>lt;<u>http://www.newforest.gov.uk/article/16541/Local-Plan-Review</u>> last accessed [02/03/18]
<sup>7</sup> Based on communication between New Forest District Council and New Milton Town Council as at September 2017

- Mitigation measures to manage the cumulative effects of residential development across the District on the designated European sites, including the use of Suitable Alternative Natural Greenspaces (SANG) and other on-site and off-site measures.
- 2.6 With relevance to the part of the Neighbourhood Plan area within the National Park, The New Forest National Park Authority (NFNPA) adopted their Core Strategy & Development Management Policies DPD in December 2010. The NFNPA commenced a review of the Local Plan in 2015 and held a final consultation on the proposed Submission draft Local Plan in January 2018. This was submitted to the Secretary of State and following hearing sessions a consultation is currently underway on the Proposed Main Modifications to the Local Plan.
- 2.7 Neighbourhood plans will form part of the development plan for the district, alongside, but not as a replacement for the Local Plan. The Local Plan Review seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in New Forest District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.8 In this context the NMNP seeks to shape new development in the Neighbourhood Plan area through taking a proactive approach to site allocations in the Neighbourhood Plan area. This is with a view to supporting the vitality of the Neighbourhood Plan area, including through delivering housing of a range of types and tenures which encourages and facilitates a diversification of the age profile of the community.

### Vision for the NMNP

2.9 The vision for the NMNP, which was developed during earlier stages of plan development, is as follows:

"New Milton has changed for the better. The influx of younger people, many using our improved rail services for commuting, has led to a wider range of shops and services in the town centre and more employment opportunities through the retention of key local employers. There are now more school places and extra childcare facilities, and we have a more vibrant arts and cultural scene. Our roads remain very busy, but more people now use our local bus services or cycle or walk to work or to the town centre.

Barton-on-Sea has retained its local character and remains a popular place to live for our older residents. Some small infill housing schemes have fitted in well. The seafront, although continually challenged by the effects of erosion, remains a popular attraction for local people and visitors alike.

Our part of the National Park, around Bashley, has maintained its special landscape character, with little change other than through the provision of appropriate small scale rural affordable housing".

- 2.10 In order to achieve this vision, the following objectives are outlined in the Neighbourhood Plan:
  - To reduce the difference in population numbers between the 20-40 age group and 65+ age group
  - To widen the role of the Town Centre in its range of the retail and service sector uses, in its cultural function and as a vital housing location
  - To increase the capacity of the early years and education sector
  - To reduce the number of visits by local people to the New Forest for short recreation trips
  - To increase the number of commuting trips by rail, bus, cycling and walking

- To Increase the capacity of the arts and cultural sectors
- 2.11 To support the Neighbourhood Plan's vision and objectives, the NMNP sets out 19 Neighbourhood Plan policies. The submission version of these policies has been appraised in Chapter 5.

# 3. The Scope of the SA

# **SA Scoping Report**

- 3.1 The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>8</sup> These authorities were consulted on the scope of the NMNP SA in June 2017.
- 3.2 The purpose of scoping was to outline the 'scope' of the SA through setting out:
  - A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
  - Baseline data against which the Neighbourhood Plan can be assessed;
  - The key sustainability issues for the Neighbourhood Plan; and
  - An 'SA Framework' of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in **Appendix A**.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1**.

#### Table 3.1: Consultation responses received on the SA Scoping Report

Consultation response	How the response was considered and addressed
Natural England	
Sharon Jenkins, Consultation Team	
Screening Request: Strategic Environmental Assessment / Sustainability Appraisal	Comment noted
It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.	
Neighbourhood Plan	Comment noted
Guidance on the assessment of Neighbourhood Plans in light of the SA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SA, for instance where:	
<ul> <li>a neighbourhood plan allocates sites for development</li> </ul>	
<ul> <li>the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan</li> </ul>	
<ul> <li>the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.</li> </ul>	
We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.	

<sup>&</sup>lt;sup>8</sup> In-line with Article 6(3).of the SA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme'.'

Consultation response	How the response was considered and addressed
We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.	The SA process has considered the European, national and locally important sites for biodiversity in the context of the emerging Neighbourhood Plan.
Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SA is necessary.	Comment noted
Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.	Comment noted

#### Historic England Robert Lloyd-Sweet, Historic Places Adviser

We are pleased to see that the scoping report identifies the local distinctiveness study for New Milton and the Old Milton Conservation Area Appraisal as important sources of evidence for the Neighbourhood Plan. The review of key features of the conservation area is of particular help. We would like to see this reflected in more locally specific criteria for assessing the impact of options on the sustainability objectives to Protect, maintain, enhance ... the cultural heritage of the area. For example, the view of the Conservation Area along Southern Lane is picked out as particularly sensitive and its conservation should therefore, perhaps, be identified as a criterion.

The assessment questions within the Landscape and Historic Environment section of the SA Framework have been reviewed and updated to state the following:

- Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and nondesignated, and their setting?
- Support the setting and special qualities of the Old Milton Green Conservation Area?

The sensitivity of the view of the Conservation Area along Southern Lane has been included as a headline sustainability issue within the Landscape and Historic Environment SA Theme.

#### **Consultation response**

Unfortunately, we note that the scoping report does not reference the County Historic Environment Record as a key source of information regarding the presence of non-designated heritage assets. The HER is available via an online searchable database and we expect SA scoping reports to identify this as a matter of course where the plan proposes to allocated sites for development. The HER is identified in the PPG as an important source of information on the historic environment for neighbourhood plans. As such we would, at present consider the scoping report to be deficient. We recommend the report is amended to identify the HER and to include a brief review of the evidence it contains with regard to the recorded presence and distribution of recorded archaeological remains and consideration for any areas of particularly high potential for remains of archaeological interest. This may also include consideration of the previous loss of any sites of particular archaeological interest, which may be identified as an issue to which future development might make a cumulative impact.

# How the response was considered and addressed

The 'summary of current baseline' for the 'Landscape and Historic Environment' SA theme has been updated to reference the Historic Environmental Record (HER) for Hampshire (presented in Appendix A of this SA Report). The assessment questions within the Landscape and Historic Environment section of the SA Framework have been reviewed and updated to state the following:

- Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and nondesignated, and their setting?
- Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.
- Conserve and enhance archaeological remains, including historic landscapes?

We note the brief reference to the purpose of the Green Belt on page 26 and would suggest this would be improved by reference to the five purposes of the green belt, which, helpfully, are set out in the NPPF as:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The 'summary of current baseline' in the Landscape and Historic Environment' SA theme has been updated to reference the five purposes of the Green Belt, as set out in the NPPF. Additionally, the assessment questions within the Landscape and Historic Environment section of the SA Framework have been reviewed and updated to state the following:

 Support the green belt designation present in the area, in accordance with its five purposes as set out in the NPPF?

Environment Agency Charlotte Lines, Senior Planning Adviser

#### Consultation response

# How the response was considered and addressed

#### **General Comments**

The Environment Agency is a statutory consultee in the planning process providing advice to Local Authorities and developers on preapplication enquiries, planning applications, appeals and strategic plans. We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include water quality, and biodiversity.

We also recommend your SA takes account of relevant policies, plans and strategies including your local Strategic Flood Risk Assessment, flood risk strategies

(<u>https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies</u>), and the South East River Basin Management Plan

(https://www.gov.uk/government/publications/south-east-river-basinmanagement-plan)

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.e nvironment-agency.gov.uk/LIT\_6524\_7da381.pdf.

#### **Specific Comments**

Page 22 under SA objective "support the resilience of the NP area to the potential effects of climate change including flooding" you have stated that the option will "ensure inappropriate development takes place in areas at higher risk of flooding".

We would suggest that the wording is amended as it contradicts National Planning Policy. Wording along the lines of "opportunities to reduce flood risk and put the most vulnerable development in lower flood risk area" would be more appropriate.

New Forest District Council and the New Forest National Park Authority are currently in the process of producing a joint Level 2 Strategic Flood Risk Assessment (SFRA) and this should be used to inform the emerging SA, ensuring that flood risk and climate change is fully taken into account when considering allocation options and in the preparation of plan policies, including policies for flood risk management to ensure that flood risk is not increased.

The following plans and policies have been added to the context review and baseline data presented in Appendix A of this SA Report:

- Strategic Flood Risk Assessment (SFRA) for the New Forest (Climate Change chapter); and
- South East River Basin Management Plan (Land, Soil and Water Resources chapter).

The Neighbourhood Planning advice has been considered through the SA process.

The assessment questions within the Climate Change section of the SA Framework have been reviewed and updated to state the following:

 Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?

Comment noted

# Key Sustainability Issues

- 3.5 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SA. These issues are as follows, presented by eight SA Themes.
- 3.6 Air Quality
  - Air quality in the NMNP area is good, with no significant issues identified
  - There are no Air Quality Management Areas and no Air Quality Action Plans in place within the Neighbourhood Plan area.
  - Housing and employment growth's impacts on traffic and congestion in the Neighbourhood Plan area have the potential to increase emissions and reduce air quality.
- 3.7 Biodiversity and Geodiversity
  - Internationally, nationally and locally designated sites are present in the NMNP area.
  - The majority of the built up area of the NMNP area is within SSSI Impact Risk Zones for either the New Forest SSSI or the Highcliffe to Milford Cliffs SSSI
  - The NMNP area has a rich geodiversity resource which should be protected and enhanced.
  - Biodiversity Action Plan Habitats are present through the NMNP area supporting a range of species, including protected species.
  - Key issues relating to European designated sites have been considered through the Habitats Regulations Assessment currently being undertaken for the Neighbourhood Plan.
- 3.8 Climate Change
  - An increase in the built footprint of the NMNP area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions.
  - New Forest District has had slightly higher per capita emissions total than that of both the South East of England and England as a whole since 2005.
  - However New Forest District has also seen a greater reduction in emissions when compared with 19.3% the South East and England.
  - The potential effects of climate change on the NMNP area are varied. AS such there is a need to improve the resilience of the Neighbourhood Plan area by supporting and encouraging adaptation strategies.
- 3.9 Landscape and Historic Environment
  - The New Forest National Park covers the northern part of the NMNP area.
  - Green Belt covers a significant proportion of the NMNP area.
  - The NMNP area has 33 Grade II Listed buildings.
  - 13 distinct landscape character areas have been identified within the NMNP area
  - New development has the potential to lead to beneficial and adverse effects on the historic environment, including through affecting the setting of cultural heritage assets and landscape/townscape quality.
  - New development could lead to pressures on non-designated sites and townscapes, including from the loss of key built and natural features.
  - Improvement in access to and enhancement of, historic environment assets and enhancements to local distinctiveness through high quality development has potential for positive benefits for tourism.
  - As stated within the Old Milton Conservation Area Appraisal, the view of the conservation area along Southern Lane is particularly sensitive to change.

- 3.10 Land, Soil and Water Resources
  - A detailed agricultural land classification assessment has been undertaken in the NMNP area, with a number of areas of land classified as Grade 2 and Grade 3a agricultural land, noted for being the best and most versatile for agricultural purposes.
  - There are three watercourses within the NMNP area.
  - An area in the north of the NMNP area is within a Nitrate Vulnerable Zone, as is a large area adjacent to the NMNP area.
- 3.11 Population and Community
  - A significantly higher proportion of residents are over 65 years of age when compared to regional and national averages.
  - The Neighbourhood Plan area has an ageing population. An ageing population has implications for community and service provision in the Neighbourhood Plan area. A more balanced profile is required to ensure viability and sustainability for New Milton – to ensure a thriving economy and working age people to provide essential local services.
  - The current gap between lower incomes and high house and rental prices means there is a need for affordable homes that corresponds with the 930 homes proposed through the New Forest Local Plan. However, this need is unlikely to be met due to economic viability for development.
  - To support existing businesses and attract new businesses into New Milton a pool of younger and technically qualified young people is needed. This will help support higher salaries.
  - New Milton town centre currently lacks vitality. An ageing population is unlikely to enhance the viability and economic vitality of the area.
- 3.12 Health and Wellbeing
  - The majority of residents within the NMNP area report their health to be very good, or good. However the level of reported 'very good' health is below local, regional and national averages.
  - Comparatively more residents report bad health or very bad health than district, South East or national averages.
  - Community consultation highlights that the quality of the environment and opportunities for leisure and recreation are a key influence on physical and mental health.
  - An ageing population has the potential to increase pressures on healthcare services.
- 3.13 Transportation
  - New Milton railway station is located within the NMNP area, with services to local, regional and national destinations, including direct to London Waterloo. The rail link is a key contributor to the quality of life of residents and economic vitality.
  - A limitation of traffic congestion and adequate parking are important to the quality of life of local residents.
  - There are a number of bus services running in the area. There is, however, inadequate service within the town with the result of reliance on cars.
  - Relevant in particular to older age groups, there are limited affordable options for transport for which driving is no longer a practical option.
  - There is also an inadequate evening bus service which is limiting a night time economy in the town.
  - Increased commuter traffic through Bashley is a great concern to the village, as well as problems with speeding.

- There is a need for continued enhancements to public transport and walking and cycling networks in the Neighbourhood Plan area.
- There is a lack of a comprehensive and co-ordinated walking and cycling network in New Milton.
- The town centre experiences significant congestion issues, particularly during peak summer periods.

# SA Framework

3.14 The issues were then translated into an 'SA Framework'. This SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SA framework for the NMNP is presented below.

#### Table 3.2: SA Framework for the New Milton Neighbourhood Plan

SA Objective	Assessment questions
Air Quality	
Improve air quality in the Neighbourhood Plan area and minimise and/or mitigate against all sources of environmental pollution.	<ul> <li>Will the option/proposal help to:</li> <li>Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the Neighbourhood Plan area?</li> </ul>
Biodiversity and Geodi	0
Protect and enhance all biodiversity and geological features.	<ul> <li>Will the option/proposal help to:</li> <li>Support continued improvements to the status of the European designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including The New Forest SPA and SAC?</li> <li>Support the status of the nationally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including the Highcliffe to Milford Cliffs SSSI and the New Forest SSSI?</li> <li>Protect and enhance semi-natural habitats?</li> <li>Protect and enhance priority habitats, and the habitat of priority species?</li> <li>Achieve a net gain in biodiversity?</li> <li>Support enhancements to multifunctional green infrastructure networks?</li> <li>Protect and enhance sites of geodiversity interest?</li> <li>Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
Climate Change	
Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<ul> <li>Will the option/proposal help to:</li> <li>Reduce the number of journeys made?</li> <li>Reduce the need to travel?</li> <li>Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>Generate energy from low or zero carbon sources?</li> <li>Reduce energy consumption from non-renewable resources?</li> <li>Encourage and facilitate energy efficient and sustainable design within new development?</li> </ul>

SA Objective	Assessment questions
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<ul> <li>Will the option/proposal help to:</li> <li>Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?</li> </ul>
Landscape and Historic	
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the	<ul> <li>Will the option/proposal help to:</li> <li>Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>Support the setting and special qualities of the Old Milton Green Conservation Area?</li> </ul>
historic environment and archaeological assets.	<ul> <li>Support the integrity of the historic setting of key buildings of cultural heritage interest?</li> <li>Conserve and enhance local diversity and character?</li> </ul>
	<ul> <li>Support access to, interpretation and understanding of the historic environment?</li> <li>Protect and enhance the integrity of the Old Milton Green Conservation Area?</li> <li>Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.</li> <li>Conserve and enhance archaeological remains, including historic landscapes?</li> </ul>
Protect and enhance the character and quality of landscapes and townscapes.	<ul> <li>Will the option/proposal help to:</li> <li>Support the integrity of the local landscape character?</li> <li>Conserve and enhance landscape and townscape features?</li> <li>Protect and enhance the integrity of the Old Milton Green Conservation Area?</li> <li>Support the green belt designation present in the area, in accordance with its five purposes as set out in the NPPF?</li> </ul>
Land, Soil and Water R	esources
Ensure the efficient and effective use of land.	<ul> <li>Will the option/proposal help to:</li> <li>Promote the use of previously developed land?</li> <li>Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 2 and 3a agricultural land?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. Use and manage water resources in a	<ul> <li>Will the option/proposal help to:</li> <li>Reduce the amount of waste produced?</li> <li>Support the minimisation, reuse and recycling of waste?</li> <li>Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>Encourage recycling of materials and minimise consumption of resources during construction?</li> <li>Will the option/proposal help to:</li> <li>Support improvements to water quality?</li> </ul>
sustainable manner.	<ul> <li>Minimise water consumption?</li> <li>Protect groundwater resources</li> <li>Provide adequate infrastructure provision for water supply and sewerage?</li> </ul>

SA Objective	Assessment questions		
Population and Community			
Create a more balanced age profile by 2036	<ul> <li>Will the option/proposal help to:</li> <li>Enable enough working age people to live and work in New Milton to balance the age profile?</li> <li>Encourage younger people and families to stay in the area to help balance the age profile?</li> </ul>		
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. Provide everyone with the opportunity to live in good quality, secure affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul> <li>Will the option/proposal help to:</li> <li>Promote the development of a range of high quality, accessible community facilities?</li> <li>Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>Minimise fuel poverty?</li> <li>Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>Support the provision of land for allotments and cemeteries?</li> <li>Will the option/proposal help to:</li> <li>Provide housing which is affordable and attractive to younger people and families and meet the identified need?</li> <li>Support the provision of a range of house types and sizes?</li> <li>Promote the provision of affordable housing which provide the security of meeting longer term needs?</li> <li>Support enhancements to the current housing stock?</li> <li>Meet the housing needs of an increasing population of over 65s</li> <li>Encourage older age groups to down size to meet their changing needs while freeing up larger family homes?</li> <li>Provide quality and flexible homes that meet people's needs?</li> <li>Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>Provide housing in sustainable locations that allow easy access to a</li> </ul>		
Regenerate the local economy with knowledge-based businesses, support existing and developing businesses to increase efficiency and profitability and raise qualification levels. Support the future adaptation and evolution of New Milton	<ul> <li>range of local services and facilities?</li> <li>Will the option/proposal help to: <ul> <li>Enable and encourage key local business and employment opportunities to stay and grow in New Milton?'</li> <li>Provide appropriate accommodation and support services for knowledge-based businesses?</li> <li>Ensure a suitably qualified talent pool in New Milton?</li> <li>Enhance high quality employment opportunities?</li> </ul> </li> <li>Will the option/proposal help to: <ul> <li>Provide a greater quality and variety of retail and leisure opportunities?</li> </ul> </li> </ul>		
town centre to create a thriving social, retail and leisure centre for all? Enhance educational attainment in the Neighbourhood Plan area to support economic vitality?	<ul> <li>Support the visitor economy of the Neighbourhood Plan area?</li> <li>Will the option/proposal help to: <ul> <li>Provide enough school and pre-school places for increased population</li> <li>Raise qualification levels to provide pool of qualified workers to attract business</li> <li>Link educational opportunities to new knowledge-based businesses for young people here and to attract young people to move here</li> </ul> </li> </ul>		

SA Objective	Assessment questions
Health and Wellbeing	
Improve the health and wellbeing of residents within the New Milton Neighbourhood Plan area.	<ul> <li>Will the option/proposal help to:</li> <li>Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>Align to the priority areas outlined in the Joint Strategic Needs Assessment?</li> <li>Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>Reduce noise pollution?</li> <li>Promote the use of healthier modes of travel?</li> <li>Improve access to the countryside for recreational use?</li> <li>Provide safe accessibility around the town (with the Green Loop and Rail Trail), to the station, New Forest, coast and employment sites by foot?</li> <li>Respond to an increase in the Neighbourhood Plan's older population through attracting younger people to the area?</li> </ul>
Transportation	Will the option/pronocal hole to
Promote sustainable transport use and reduce the need to travel.	<ul> <li>Will the option/proposal help to</li> <li>Encourage modal shift to more sustainable forms of travel?</li> <li>Help reduce congestion in the town centre and other key hotspots, including Bashley village?</li> <li>Help reduce congestion on key through routes, such as Bashley village?</li> <li>Enable sustainable transport infrastructure enhancements?</li> <li>Facilitate working from home and remote working?</li> <li>Improve road safety?</li> <li>Reduce the impact on residents from the road network?</li> </ul>

# 4. What has plan making / SA involved to this point?

### Introduction

- 4.1 In accordance with the SEA Regulations the SA Report must include...
  - An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SA up to this point is told within this part of the SA Report. Specifically, this section explains how preparation of the current version of the NMNP has been informed by an assessment of alternative locations for non-strategic scale development in the Neighbourhood Plan area.

# **Overview of plan making / SA work undertaken since 2015**

- 4.3 Plan-making for the NMNP has been underway since February 2015. Initial work incorporated the inauguration of a Neighbourhood Plan Working Party and engagement with New Forest District Council. A range of consultation events have since been carried out for the Neighbourhood Plan to engage the community and enable their input into the plan making process. This has included community questionnaires, drop in sessions and workshops. Regulation 14 consultation was also undertaken on the Neighbourhood Plan (accompanied by an earlier version of this SA Report) in April/May 2018
- 4.4 The following sections discuss the evolution of the NMNP in association with the SA process.

# Assessment of reasonable alternatives for the Neighbourhood Plan

- 4.5 A key element of the SA process is the appraisal of 'reasonable alternatives' for the NMNP. The SEA Regulations<sup>9</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report (i.e. SA Report) should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.6 As discussed in Section 2.1, the Neighbourhood Plan has been prepared in conjunction with the provisions of the existing and emerging New Forest District Local Plan. The New Forest Local Plan 2016 2036 incorporates the release of Green Belt land in two locations for a total of 290 homes (SS10 Brockhills Lane and SS11 South of Gore Road) and a need for an additional 200 homes to be planned for by the NMNP.
- 4.7 To support the development of a spatial strategy to deliver these indicative numbers, the Neighbourhood Plan Working Group was keen to consider alternative locations for delivering housing in the Neighbourhood Plan area. In light of this, the Neighbourhood Plan Steering Group considered where broadly in the parish such development should go.
- 4.8 To support decision making on this element of the plan, the SA process has considered two sets of options, with a view to exploring the sustainability implications of delivering housing in alternative locations in the Neighbourhood Plan area.
- 4.9 The following sections therefore present the assessment of these sets of options.

<sup>&</sup>lt;sup>9</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## Assessment of broad locations for housing

- 4.10 To support the development of a spatial strategy to deliver the indicative number of 200 homes, the Neighbourhood Plan Working Group was keen to consider alternative locations for delivering housing in the parish.
- 4.11 The SA process has considered three options, with a view to exploring the sustainability implications of delivering housing in alternative broad locations in the parish. Corresponding with the two principal settlements of the Neighbourhood Plan area, the options are as follows:
  - Option 1: Facilitate the delivery of homes through the Neighbourhood Plan through a focus on New Milton
  - Option 2: Facilitate the delivery of homes through the Neighbourhood Plan through a focus on Barton-on-Sea
  - Option 3: Facilitate the delivery of homes through the Neighbourhood Plan in locations outside of New Milton and Barton-on-Sea.
- 4.12 With regard to Option 3, it is noted that the areas outside of New Milton and Barton-on-Sea are within designated Green Belt, with the exception of the area to the north of New Milton, which is located within the New Forest National Park. The current NPPF does not allow Neighbourhood Plans to change Green Belt boundaries and Green Belt boundaries can only be altered in exceptional circumstances through the preparation or review of a Local Plan. In March 2018 the Ministry of Housing, Communities and Local Government launched a consultation on a revised NPPF which consolidates a number of recent proposed changes and additions. Paragraph 135 of the draft revised NPPF notes that where a Local Plan identifies a need for Green Belt release then "detailed amendments to those boundaries may be made through local policies, including Neighbourhood Plans". It is noted though that the revised NPPF will remain in place in the short term. However, it was viewed worth considering Option 3 as an alternative to be considered through the SA process given it would help provide context to decisions made on the Neighbourhood Plan and help highlight the relative sustainability merits of alternative approaches.
- 4.13 The SA team appraised these three broad options as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). These were considered through the SA Framework of objectives and assessment questions developed during scoping and the three options have been ranked in terms of their sustainability performance against the relevant SA Theme.
- 4.14 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eight SA Themes.
- 4.15 For each SA Theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking.
- 4.16 The findings of the appraisal are presented in **Table 4.1** below.

#### Table 4.1: Appraisal findings: reasonable alternatives for broad locations of development

**Option 1:** Facilitate the delivery of homes through the Neighbourhood Plan through a focus on New Milton **Option 2:** Facilitate the delivery of homes through the Neighbourhood Plan through a focus on Barton-on-Sea **Option 3:** Facilitate the delivery of homes through the Neighbourhood Plan in locations outside of New Milton and Barton-on-Sea.

SA Theme	Discussion of potential effects and relative merits of options	Rank	of prefe	of preference	
	Discussion of potential effects and relative ments of options	Opt 1	Opt 2	Opt 3	
Air Quality	Through directing new development to the more rural parts of the Neighbourhood Plan area, which have fewer services and facilities, Option 3 would do the most of the options to lead to increased car dependency and a more limited use of sustainable modes of transport. This has the potential to lead to increases in emissions from transport through increasing the need to travel for key services and facilities. In a similar context, Option 1, through locating development in the settlement with the broadest range of services, facilities and amenities (New Milton) has the most potential of the options to limit emissions from transport. Option 2, through directing housing to Barton-on-Sea, which has fewer amenities than New Milton, is however less likely to support a limitation of emissions.	1	2	3	
Biodiversity and geodiversity	The delivery of housing in the rural parts of the Neighbourhood Plan area has increased potential to lead to impacts on sites internationally and nationally designated for their nature conservation value. For example the area north of New Milton within the National Park is within a number of SSSI Impact Risk Zones (IRZ) for residential development, including IRZs for 'all planning applications' and 'residential development of 25 units or more'. These impacts relate to the New Forest SSSI. This is significant given the area covered by the SSSI is also internationally designated as the New Forest Ramsar site, New Forest SAC and New Forest SPA. In relation to the rural areas outside of Barton-on-Sea, the area to the west of the settlement is within an SSSI IRZ relating to the New Forest SSSI for 'all planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures.' Alongside, areas to the east of the settlement are within an SSSI IRZ relating to the Highcliffe to Milford Cliffs SSSI for all planning applications. Whilst parts of both New Milton and Barton-on-Sea are within IRZs for the two SSSIs, these areas are less sensitive given their more urban context. This is reflected by the categories of IRZs in these areas being less restrictive. Overall therefore, Option 3 has increased potential of the three options to lead to adverse impacts on internationally and nationally designated sites. In terms of key biodiversity habitats, both New Milton and Barton- on-Sea have significant areas of Biodiversity Action Plan (BAP) Priority Habitat located within or adjacent to the settlements. This includes significant areas of deciduous woodland BAP Priority Habitat in the vicinity of New Milton (a number of which are also Ancient Woodland) and Woodpasture and Parkland BAP Priority Habitat located to the east of Barton-on-Sea.	1	1	3	

**Option 1:** Facilitate the delivery of homes through the Neighbourhood Plan through a focus on New Milton **Option 2:** Facilitate the delivery of homes through the Neighbourhood Plan through a focus on Barton-on-Sea **Option 3:** Facilitate the delivery of homes through the Neighbourhood Plan in locations outside of New Milton and Barton-on-Sea.

SA Theme	Discussion of notantial effects and relative marite of entions	Rank	k of preference	
	Discussion of potential effects and relative merits of options	Opt 1	Opt 2	Opt 3
Climate change	In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the Neighbourhood Plan area. The extent to which the three options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. Through directing new development to the more rural parts of the Neighbourhood Plan area, which have fewer services and facilities, Option 3 would do the most of the options to lead to increased car dependency and a more limited use of sustainable modes of transport. This has the potential to lead to increases in greenhouse gas emissions from transport through increasing the need to travel for key services and facilities. In a similar context, Option 1, through locating development in the settlement with the broadest range of services, facilities and amenities (New Milton) has the most potential of the options to limit emissions from transport. Option 2, through directing housing to Barton-on-Sea, which has fewer amenities than New Milton, is however less likely to support a limitation of emissions. In relation to flood risk, all three areas covered by the options have flood risk issues in some limited locations, with historic flooding. Whilst the three options have the potential to lead to development in areas of elevated levels of flood risk, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example, the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere without appropriate mitigation measures. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken for the wider district will help limit effects.	1	1	1
Landscape and historic environment	In relation to landscape designations, rural areas in the north of the Neighbourhood Plan area are within the New Forest National Park, which is a nationally designated landscape. In this context development to the north of New Milton has the potential to have impacts on the setting of the National Park. It should be noted however that development taken forward through all three options has the potential to have impacts on landscape character with inappropriate location, design and layout of development, including relating to the existing setting of the settlements in the Neighbourhood Plan area. New Milton and Barton-on-Sea do not have a rich historic environment (with the exception of the Old Milton Green Conservation Area, which covers a small part of New Milton). A number of nationally designated listed buildings are however present in rural areas in the vicinities of these settlements. In this context, Option 1 and 2 have the potential to lead to impacts on the historic environment and landscape character through facilitating growth in the vicinities of New Milton and Barton-on-Sea. However, Option 3, through directing development to the more sensitive areas of the Neighbourhood Plan area, has the most potential of the options to lead to impacts on historic environment assets and their settings and landscape character.	1	1	3

**Option 1:** Facilitate the delivery of homes through the Neighbourhood Plan through a focus on New Milton **Option 2:** Facilitate the delivery of homes through the Neighbourhood Plan through a focus on Barton-on-Sea **Option 3:** Facilitate the delivery of homes through the Neighbourhood Plan in locations outside of New Milton and Barton-on-Sea.

SA Theme	Discussion of potential effects and relative merits of options	Rank	of prefe	erence	
SA meme	Discussion of potential effects and relative ments of options	Opt 1	Opt 2	Opt 3	
Land, Soil and Water Resources	A significant area of Grade 2 agricultural land is present to the north east of Barton-on-Sea. As such development in the vicinity of the settlement through Option 2 and Option 3 has increased potential to lead to the loss of land classified as the Best and Most Versatile Agricultural Land. There are also some more limited areas of land classified as the Best and Most Versatile Agricultural Land (Grade 3a land) north of New Milton, which have the potential to be lost to development through Option 1. In relation to water supply, the NPPF states that local plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity. In the context of the current assessment, it is anticipated that the Water Resources Management Plans prepared by water supply companies will be expected to address long-term water supply issues associated with growth in the Neighbourhood Plan area.	2	3	1	
Population and community	Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. New Milton has by far the broadest range of services and facilities in the Neighbourhood Plan area. Barton-on-Sea has a more limited range, with other areas of the Neighbourhood Plan area dependent on the two main settlements and settlements outside of the Neighbourhood Plan area. In this context Option 1, through focusing housing in the settlement (New Milton) with the broadest range of amenities, will do more to promote the location of new housing in accessible locations. This will help limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life. It will also help promote the vitality of New Milton town centre through supporting the variety of local shops and services. In terms of housing numbers, all of the options will meet the relevant Local Plan requirement for the Neighbourhood Plan area, and will, given the size of the likely allocations, facilitate affordable housing within allocations.	1	2	3	
Health and Wellbeing	Directing development to New Milton through Option 1 will enhance accessibility through directing housing to the settlement with the broadest range of services and facilities. It will also enhance accessibility to local medical facilities in New Milton and in the north of Barton-on-Sea. This will have benefits for the health and wellbeing of residents. Locating more housing in closer proximity to the facilities available will also support quality of life and wellbeing through promoting walking and cycling and active lifestyles.	1	2	3	
Transportation	Option 1, through focusing housing in the settlement (New Milton) with the broadest range of amenities, will do more to promote the location of new housing in accessible locations. This will help limit the need for residents to travel for day-to-day services and facilities and support sustainable modes of travel, including walking and cycling. The settlement also has the most frequent and bus services. Option 2 (and particularly) 3, through focusing housing in the locations with a limited range of services and amenities, will do less to promote the location of new housing in accessible locations. This will increase the need for residents to travel for day-to-day services and facilities.	1	3	2	

# New Milton: Development on previously developed land vs greenfield development

- 4.17 Following the consideration of where broadly new development should go in the Neighbourhood Plan area, and the outcomes of consultation events undertaken for the NMNP, it was decided that New Milton was the most appropriate location to direct new development. This is given the broader range of services and facilities available in the town, and a desire to both reconfigure the demographic profile of the town and support the vitality of the town centre.
- 4.18 In light of this, the Neighbourhood Plan Working Group was also keen to explore further options for directing the location of new development within New Milton town. In this context two potential options were considered, namely whether to 1) focus development on existing previously developed 'brownfield' sites in New Milton or 2) widen the scope of the Neighbourhood Plan to consider development on previously undeveloped 'greenfield' sites in the vicinity of New Milton. This was with a view to delivering allocations for the remaining 200 homes as required by NFDC.
- 4.19 To support decision making on this element of the NMNP, two options were considered as reasonable alternatives through the SA process. The two options were as follows:
  - 1) Option 1: Facilitate the development of greenfield sites around New Milton; and
  - 2) Option 2: Focus development on previously developed sites in New Milton.
- 4.20 Table 4.2 presents the findings of the appraisal of Option 1 and Option 2 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant theme.

#### Table 4.2: Appraisal findings: options for broad locations of development

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Air Quality	Option 2, through promoting development on previously developed land, has increased potential to facilitate the development of new housing at locations which are more integrated within the built up area of New Milton. This has the potential to allow at some locations easier access to town centre services and facilities by sustainable modes of transport such as walking and cycling. Through encouraging residents to travel by active modes of transport for shorter trips, this option has increased potential to limit contributions to air pollution private vehicles.	2	1
Biodiversity and geodiversity	Potential effects on biodiversity have the potential to take place on both previously developed and greenfield land. Whilst greenfield development has the potential to lead to the loss of key landscape features of biodiversity value and impact on ecological corridors, previously developed land can also support a biological diversity. In this context previously developed land can provide habitat for Priority Species and contribute to wider ecological networks, as well as the provision of ecosystem services such as pollination. All allocations have the potential to have impacts on biodiversity value. In this context, for all sites, potential to promote net gains in biodiversity value. In this context, for all sites, potential effects on biodiversity depend on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.		2

**Option 1:** Facilitate the development of greenfield sites around New Milton **Option 2:** Focus development on previously developed sites in New Milton

# **Option 1:** Facilitate the development of greenfield sites around New Milton **Option 2:** Focus development on previously developed sites in New Milton

SA theme	Discussion of potential effects and relative merits of options		Rank of preference	
		Opt 1	Opt 2	
Climate change	In terms of greenhouse gas emissions, road transport is a significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context, Option 2, through focusing development on previously developed land has increased potential to promote development in locations which are more integrated with the existing built up area of the town. This has the potential to allow at some locations easier access to services and facilities by sustainable modes of transport such as walking and cycling. However, the option does not preclude the development of brownfield land in less accessible locations.	2	1	
	In terms of climate change adaptation, the redevelopment of previously developed land provides opportunities for enhancing the resilience of brownfield sites and surrounding area to the effects of climate change. This includes through green infrastructure enhancements and design and layout which helps regulate the effects of extreme weather events in the town, including through regulating surface water run-off. In this context, whilst the direct provision of green infrastructure improvements to accompany new development areas should be achievable through both options, including through mechanisms such as the community infrastructure levy, the redevelopment of brownfield land increases scope for direct improvements to climate change resilience.			
Landscape and historic environment	Option 1, through facilitating greenfield development around New Milton, increases the scope for impacts on landscape character, including from visual impact and impacts on noise quality. The potential significance of such effects is increased given the presence of the National Park to the north of the town. In regard to this, greenfield development, by virtue of being less well integrated with the current built up area of New Milton has increased potential to have impacts on views from the National Park. Whilst Option 2 has the potential to have direct impacts on historic environment assets located on brownfield sites, high quality development sensitive to the historic environment resource has the potential to support enhancements to townscape character and the rejuvenation of disused or underutilised historic environment assets. This will support New Milton's historic environment resource, if high quality design and layout is incorporated within new provision. Similarly Option 2 provides opportunities for enhancing local character and distinctiveness if high quality design is incorporated within new provision. Option 2 therefore increases opportunities to rejuvenate existing underutilised heritage assets whilst protecting landscape character, and offering opportunities to enhance visual amenity and the setting of the historic environment.		1	
Land, Soil and Water Resources	Option 1 will lead to the loss of greenfield land in the vicinity of New Milton. The option also has increased potential to lead to the loss of areas of the Best and Most Versatile Agricultural Land. In contrast, Option 2 will support the efficient use of land through the reuse of existing structures and rejuvenating previously developed land. In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example, sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However, given the potential for development on previously developed land to reduce land contamination, Option 2 has the potential to lead to medium and long term improvements to water quality.	2	1	

# **Option 1:** Facilitate the development of greenfield sites around New Milton **Option 2:** Focus development on previously developed sites in New Milton

SA theme	Discussion of potential effects and relative merits of options		Rank of preference	
		Opt 1 Opt 2		
Population and community	In terms of affordable housing, such provision may be easier to deliver through the larger allocations which may be more deliverable through Option 1. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at larger sites may help enable the securing of additional contributions to site specific mitigation through Section 106 planning agreements (it should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable). Recent legislation has introduced a 10 unit threshold for affordable housing contributions. As such Option 1 may have increased opportunity for delivering affordable housing in the vicinity of the town. In terms of the provision of services and facilities, the delivery of CIL monies and similar mechanisms are likely to be more achievable through the allocations facilitated through Option 1. The rejuvenation of previously developed sites in New Milton town centre has the potential to support the vitality and vibrancy of the town centre, and offer opportunities for improving local offer and enhancing amenities. Given the existing issues relating to the town centre's vitality and offer, this has the potential to provide significant opportunities for the town centre in this regard.	2	1	
Health and Wellbeing	The delivery of housing provision through larger scale allocations potentially enabled by Option 1 has the potential to concentrate effects on road safety and noise quality from increased traffic flows at certain locations. This may have effects on the health and wellbeing of residents. Effects however depend on the location of new development areas and the integration of elements such as sustainable transport linkages and green infrastructure provision. Option 2 has the potential to support health and wellbeing through improvements to the quality of the built environment in certain locations in the town. This includes through enhancing the quality of the public realm and improving the satisfaction of residents with their neighbourhoods as a place to live. It also increases opportunities for delivering development in town centre locations more easily accessible to services, facilities and amenities, (although it should be noted that the option does not preclude brownfield development in less accessible locations).	2	1	
Transportation	Option 2, through promoting development on previously developed land, has increased potential to facilitate the development of new housing at locations which are more integrated within the built up area of the town. This has the potential to allow at some locations easier access to town centre services and facilities by sustainable modes of transport such as walking and cycling. The option does not however preclude brownfield development in less accessible locations. However, the provision of new and improved sustainable transport infrastructure to accompany new housing development, including pedestrian/cycle and public transport links may be more feasible with the larger scale of development enabled by Option 1.	2	1	

# Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

#### Choice of sites taken forward for the purposes of the Neighbourhood Plan

- 4.21 In addition to supporting the sites proposed to be allocated in the vicinity of New Milton through the New Forest Local Plan Review (i.e. Land to the East of Brockhills Lane and Land to the South of Gore Road), the current Neighbourhood Plan allocates land for in the region of 250 homes. These allocations are on previously developed mixed sites located in the town centre.
- 4.22 In addition, previously developed land associated with the former minerals workings at Caird Avenue has been allocated for mixed-use development comprising business and food retail uses and green infrastructure. A cultural/arts hub, a health and wellbeing centre and an innovation/business centre have also been allocated on further previously developed town centre sites.
- 4.23 The choice of these sites reflects the findings of evidence base studies undertaken for the NMNP and the outcomes of Neighbourhood Plan community consultation. This highlighted that there is a strong desire within the community to rejuvenate underutilised parts of the town centre and improve its offer and vitality. This is coupled with a desire to enhance the quality of the public realm and townscape within the town, and protect landscape character in the wider Neighbourhood Plan area.

# **Neighbourhood Plan policies**

- 4.24 To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.2, the submission version of the NMNP puts forward 19 policies to guide development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering. Earlier versions of these policies were also assessed and recommendations made through the SA process, including prior to Regulation 14 consultation in early 2018.
- 4.25 The policies are presented in Table 4.3 below.

#### Table 4.3: New Milton Neighbourhood Plan policies

#### Policy

NM1	A Spatial Plan for New Milton
NM2	Diversifying Housing
NM3	Land east of Caird Avenue
NM4	Design Quality
NM5	New Milton Town Centre Regeneration Area
NM6	Heritage Information Centre
NM7	Cultural/Arts Hub
NM8	Health & Wellbeing Centre
NM9	Innovation and Business Centre
NM10	Buildings of Local Heritage and Townscape Value
NM11	Mitigating Effects on European Sites
NM12	Promoting Walking and Cycling
NM13	Barton-on-Sea
NM14	The Rural Areas in the National Park
NM15	Employment
NM16	Tourism
NM17	Early Years Facilities
NM18	Education
NM19	Connecting the Town

# 5. What are the appraisal findings at this current stage?

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the NMNP. This chapter presents:
  - An appraisal of the submission version of the NMNP under the eight SA Theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

# Approach to this appraisal

- 5.2 The appraisal is structured under the eight SA Themes taken forward for the purposes of the SA.
- 5.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

# **Air Quality**

- 5.5 There are no AQMAs within the Neighbourhood Plan area. However, while air quality within the Neighbourhood Plan area is relatively good, the delivery of mixed-use development has the potential to lead to adverse effects, particularly where this coincides with key routes through the town experiencing congestion. The NMNP highlights that the main patterns of movement generated from within the town are car-based, comprising mostly one of three types of trip; outcommuting from across the town to Southampton and Dorset, shopping trips from suburbs to the town centre, and the school run. Traffic passes through the town on the east-west A337, and there is already considerable congestion at peak hours on the road system, especially on roads heading north to the A35 and Gore Road/A337 heading west. The congestion on Station Road/Ashley Road through the town centre is common across the day.
- 5.6 It is recognised that there is no specific policy on air quality within the NMNP. Indirectly however, a number of policies are seen to address this issue; particularly those which seek to promote sustainable transport use. These policies include Policy NM12 (Promoting Walking and Cycling), Policy NM1 (A Spatial Plan for New Milton), Policy NM5 (New Milton Town Centre Regeneration Area) and Policy NM4 (Design Quality). These policies refer to promote walking and may contribute to a reduction in vehicle-based trips, leading to air quality benefits. In this context, significant focus is placed on the rail station as a major role in attracting new commuting households, with Policy NM12 seeking to improve its connectivity to all parts of the town by walking, cycling and bus services.

- 5.7 The Local Plan and (to a lesser extent) the NMNP propose significant growth on the edges of the town, which may increase congestion in the town centre and on roads heading north and west. As such site allocation policy NM3 (Land east of Caird Avenue) and the emerging Local Plan strategic site allocation policies (NM3 Land at Brockhills Lane and NM4 Land South of Gore Road) recognise the potential in combination and cumulative effects of new development through setting out that infrastructure requirements to accompany development, mitigating/offsetting predicted adverse effects on the road network. This is in accordance with the Hampshire Local Transport Plan (2011-2031), which seeks to improve accessibility through the three initiatives to *"reduce, manage and invest."*
- 5.8 It is also recognised that the promotion of mixed use development in the town centre through Policy NM5-9 may contribute to reducing the need to travel; minimising vehicle trips through providing improved access to day-to-day services and facilities. This will better connect communities and contribute positively towards reducing the reliance on the car for shorter journeys, with benefits for air quality and greenhouse gas emissions.
- 5.9 Policies NM3 and 4 also require new development to provide a measure of green space, and an overall 'net gain' in biodiversity for the sites. In this context the provision of new green space and planting and landscaping through these policies will support the dissipation and absorption of pollutants.
- 5.10 Overall, the NMNP is predicted to have a residual **neutral effect** on air quality. There is the potential for some minor long term positive effects from allocations in accessible town centre locations and green infrastructure enhancements; these are however uncertain at this stage and dependent on the implementation of proposed measures and growth.

# **Biodiversity and Geodiversity**

- 5.11 In terms of European Designated Sites, a small area at the northern extent of the Neighbourhood Plan area is within the New Forest Ramsar site, and includes the New Forest Special Area for Conservation (SAC) and New Forest Special Protection Area (SPA). Whilst not within or adjacent to the Neighbourhood Plan area, the Solent Maritime SAC and Solent and Southampton Water SPA and Ramsar site are located approximately 3km south east of the Neighbouhood Plan area.
- 5.12 The presence of these European designated sites is acknowledged by the Neighbourhood Plan. Policy NM11 (Mitigating Effects on European Sites) states that residential schemes will be required to include proposals for mitigating their effects on European sites, both through on-site provision or off-site financial contribution, and have due regard to the "*Mitigation for European Sites SPD as it applies to New Forest SPA, SAC and Ramsar site, Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar site.*"
- 5.13 Policy NM11 also recognises specifically the potential implications of new development in the Neighbourhood Plan area on European designated sites from impacts on water quality. As such it seeks to ensure have regard to water quality and the mitigation of nutrient enrichment and the treatment and infrastructure capacity to avoid water quality impacts on the integrity of European sites within the Solent. This reflects the recommendations of the HRA undertaken to inform the development of the NMNP.
- 5.14 With regard to the mixed-use site allocation Land at Caird Avenue, Policy NM3 (Land east of Caird Avenue) seeks to ensure that measures are implemented "...to satisfy the Habitat Regulations and the adopted New Forest Special Protection Area Mitigation Strategy or future requirements". The policy also has a strong focus on green infrastructure provisions, which will further help limit impacts from recreational pressures.
- 5.15 Improving the multifunctionality of green infrastructure associated with existing open spaces will likely encourage the use of local recreational sites for new and existing residents and visitors, limiting recreational pressures on the European sites. The provision of alternative recreational opportunities away from the European nature conservation sites is also identified as a key objective within the Countryside Access Plan, and will provide long-term protection for the site,

reducing opportunities for adverse effects on the designated sites, for example through recreational disturbance and/or habitat loss/fragmentation.

- 5.16 Policy NM16 (Tourism) also seeks to offer a degree of protection for European sites through highlighting that "*Proposals for the development of new visitor accommodation in New Milton and Barton-on-Sea, or for a change of use to such accommodation, will be supported provided it can be demonstrated there will be no adverse effect on European Sites*".
- 5.17 In terms of nationally designated sites, the northern part of the Neighbourhood Plan area lies within the New Forest National Park/ Site of Special Scientific Interest (SSSI) which extends north beyond the Neighbourhood Plan boundary. Additionally, the Highcliffe to Milford Cliffs SSSI is located at the south of the Neighbourhood Plan area, extending along the coast. SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In terms of the allocations taken forward for the Neighbourhood Plan, none of the sites are within IRZs for the type and scale of development proposed.
- 5.18 Carrick Way Woodland is a Site of Importance for Nature Conservation (SINC), located adjacent to the site allocation Land at Caird Avenue. Policy NM3 (Land at Caird Avenue) requires proposals for this site be accompanied by a green infrastructure scheme which includes "an effective landscape buffer to screen the adjoining minerals operations, the employment land from residential development and to screen Carrick Way Woodland SINC". It is thought that this, along with other mitigation measures proposed through policy NM3 should contribute positively towards minimising adverse effects on the SINC and the surrounding nationally designated landscape.
- 5.19 Policy NM4 (Design Quality) provides an overarching requirement for new development to be of high quality design and layout. Additionally, the new development must include "...appropriate landscaping and well-connected greenspace integrated with existing landscape features." Further to this, the policy seeks to protect open spaces, trees and gardens and that all development proposals should "...ensure the protection of local biodiversity assets and should seek to provide additional habitat resources for wildlife and green spaces for the community that result in a biodiversity 'net' gain for the town." This will support habitats, species and ecological networks in the town.
- 5.20 Overall, the current version of the NMNP is predicted to have **uncertain minor positive effects** on biodiversity. In relation to potential adverse effects as a result of the site allocation Land at Caird Avenue, it is expected that these will be mitigated through detailed design identified through Policy NM3 (Land east of Caird Avenue) and other relevant policies identified within the NMNP. However there is currently some uncertainty relating to the implementation and phasing of growth, which may impact upon the significance of effects.
- 5.21 In addition, the NMNP has a strong focus on protecting and enhancing biodiversity in and around the town, providing 'net gain' where possible. The NMNP also plans positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, with particular focus placed on European Designated sites.

# **Climate Change**

- 5.22 In terms of climate change mitigation, road transport is a notable contributor to greenhouse gas emissions in the Neighbourhood Plan area. Emissions are discussed under the 'Air Quality' SA theme.
- 5.23 Enhancements to green infrastructure networks promote climate change mitigation through supporting carbon sequestration and promoting walking and cycling, and climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. In this context Policies NM3 (Land east of Caird Avenue), NM4 (Design Quality), Policy NM11 (Mitigating Effects on European Sites), Policy NM12 (Promoting Walking and

Cycling), Policy NM12 (Barton-on-Sea) will support the ongoing development of high quality multifunctional green infrastructure networks throughout the Neighbourhood Plan area.

- 5.24 The NMNP further supports both climate change mitigation and adaptation through Policy NM4 (Design Quality). This supports new development which "*positively addresses climate change through early consideration of layout and building design, and through passive design, energy and water efficiency, and renewable energy measures*" and which includes provisions for electric vehicle charging points in public areas.
- 5.25 With regard to flood risk in the Neighbourhood Plan area, the New Forest Catchment Flood Management Plan (2009) states that the main risk to the NMNP area is from river flooding, with areas of risk associated principally with Walkford Brook, Becton Bunny and Danes Stream. There is also low to medium risk from surface water flooding. The addressing of issues linked to flooding are likely to be supported by the provisions of the NPPF, in addition to those within the Catchment Flood Management Plan. Additionally, the policies relating to flood risk, SuDS and surface water flooding proposed by the emerging Local Plan Review are expected to further help limit adverse effects in this regard. However the policy for the Land east of Caird Avenue (Policy NM3) recognises the potential impacts of new development in this location on flood risk through seeking to ensure the "delivery and maintenance of an effective sustainable drainage system including the protection of Danes Stream and the retention of at least an 8m buffer zone."
- 5.26 Whilst the above approaches will contribute positively towards addressing climate change, these are not seen to be significant in the context of the SA process. As such, the NMNP is predicted to have a residual **minor positive effect** on climate change.

# Landscape and Historic Environment

- 5.27 In relation to landscape designations, rural areas in the north of the Neighbourhood Plan area are within the New Forest National Park, which is a nationally designated landscape. Policy NM1 (A Spatial Plan for New Milton ) highlights that the countryside around Bashley, which lies in the New Forest National Park, and to the east of Barton-on-Sea, which lies in the Green Belt, will be protected from development. In line with Policy NM14 (The Rural Areas in the National Park) development will only be supported in these locations where it accords with the development plan policies relating to the Green Belt or the New Forest National Park. This will ensure that development does not detract from the established landscape character of the area.
- 5.28 Barton-on-Sea is identified through the NMNP as a distinct location, characterised by its views of the sea, and to the Isle of Wight, and the wide open cliff-top green space in front of a varied line of residential buildings. Policy NM13 (Barton-on-Sea) further requires that development proposals have regard to the seafront and gardens, maintaining the coastal landscape and built heritage features. This will support landscape and townscape character in the village.
- 5.29 It is recognised that New Milton can only grow by utilising Green Belt land. At present, Neighbourhood Plans are not able to modify Green Belt boundaries to release land for development; this remains the responsibility of local planning authorities. The Town and District Councils have worked closely together to make a series of site-specific proposals in both this Neighbourhood Plan and the emerging Local Plan Review. The new Local Plan Review proposes to release land on the north eastern and south western edges of the town where the technical evidence indicates the land makes only a modest contribution to the purposes of the Green Belt.
- 5.30 In terms of the mixed use development at the Land east of Caird Avenue, Policy NM3 seeks to ensure development is taken forward through a comprehensive masterplan approach which implements appropriate interventions to protect and enhance landscape quality. This includes: a landscape buffer to screen the adjoining minerals operations, the employment land from residential development and to screen Carrick Way Woodland; the retention of existing trees on the southern boundary; and the retention of the existing shelter belt of mature trees / hedgerow and green verges on the western boundary to maintain the green setting of Caird Avenue.

- 5.31 The setting and character of the Neighbourhood Plan area will be further supported through Policy NM4 (Design Quality), which requires all new development to be of a high quality design which complements and enhances the local character and identity of the Neighbourhood Plan area. Specifically, Policy NM4 requires development to be "of high quality design and layout and includes appropriate landscaping and well-connected greenspace integrated with existing landscape features", contributes positively to the public realm, contributes to local distinctiveness including the special character of the New Forest National Park, and protects open spaces, trees and gardens that contribute to the character of the area.
- 5.32 New Milton does not have a rich historic environment (with the exception of the Old Milton Green Conservation Area, which covers only a small part of New Milton). A number of nationally designated listed buildings are however present in rural areas in the vicinities of these settlements. The town centre is a predominately mid to late 20<sup>th</sup> Century urban environment, with no designated heritage assets. However Policy NM10 (Buildings of Local Heritage & Townscape Value) identifies The Lloyds Bank building, 47 Station Road, New Milton Station buildings, platforms and canopies and the former Milton Hall as buildings and structures with local heritage and townscape value, and seeks to ensure that redevelopment schemes acknowledge and take into account that value in their design proposals and support their conservation and enhancement.

In this context, looking specifically at the Town Centre Opportunity Area redevelopment sites, Policy NM5 (The New Milton Town Centre Opportunity Area) seeks to ensure that new development proposals demonstrate how they will contribute to the Town Centre Vision, a key element of which is the conservation and enhancement of the historic environment and the quality of the townscape. The Town Centre Opportunity Area policy will also be further supported by Policy NM6 and NM7's proposals to convert the old Station Building into a Heritage and Information Centre and the development of a Cultural & Community Hub as a further Town Centre redevelopment scheme. This will support the rejuvenation of local heritage assets, and will also help engage residents with the cultural heritage of the town, providing opportunity for learning, promoting a greater understanding of the local character and history.

5.33 The NMNP has the potential to lead to residual minor positive effects on landscape and historic environment. Whilst it is recognised that the strategic site allocations may lead to adverse effects upon the setting of the New Forest National Park, it is anticipated that these elements will be considered through the Local Plan Review, including its SA process, and mitigation measures delivered. As such the Neighbourhood Plan will not itself lead to these effects. In the case of Land at Caird Avenue, it is expected that adverse effects may be mitigated through detailed masterplanning proposed through Policy NM3. It is also recognised that the Neighbourhood Plan policies' focus on the protection of landscape character and local distinctiveness may further address adverse effects where they may arise, and the redevelopment of underutilised sites in the town centre will lead to enhancements in the quality of the public realm, townscape character and local distinctiveness in the town centre.

# Land, Soil and Water Resources

- 5.34 As the second largest settlement in the District, New Milton is an especially sustainable location to accommodate proposals for mixed-use development, either on brownfield land within the settlement or on land at its edges to be released from the Green Belt. Reusing land that has been previously developed will promote the efficient use of land. Where land is being released from the Green Belt, this is due to the technical evidence indicating that the land makes only a modest contribution to the purposes of the Green Belt. This issue has been considered through the New Forest Local Plan Review and its SA. However, the Neighbourhood Plan has taken a 'brownfield first' approach, through seeking to rejuvenate previously developed land in the town centre, and supporting the development previously developed land associated with the former minerals workings at Caird Avenue. This will support the reuse of underutilised land, supporting the efficient use of land.
- 5.35 Enhancements to green infrastructure networks will support water and soil quality through promoting the ability of natural processes to support soil and water quality and increasing the capacity of the townscape/landscape to regulate surface water runoff and manage pollutants.

In this context Policy NM3 (Land east of Caird Avenue), Policy NM4 (Design Quality), Policy NM11 (Mitigating Effects on European Sites), Policy NM12 (Promoting Walking and Cycling), Policy NM13 (Barton-on-Sea) will support the ongoing development of high quality multifunctional green infrastructure networks throughout the Neighbourhood Plan area.

- 5.36 It is recognised that the proposed mixed-use development Land at Caird Avenue adjoins existing minerals operations. Policy NM3 (Land at Caird Avenue) identifies the importance of the proposed scheme not undermining the ongoing minerals operations of the adjoining land but cannot seek to modify those operations, as this is defined as 'excluded development' for a Neighbourhood Plan.
- 5.37 Overall, the NMNP is predicted to have **minor positive effects** in relation to this SA theme.

# **Population and Community**

- 5.38 In addition to supporting the sites proposed to be allocated in the vicinity of New Milton through the New Forest Local Plan Review (i.e. Land to the East of Brockhills Lane and Land to the South of Gore Road), the current Neighbourhood Plan allocates land for in the region of 250 homes.
- 5.39 The NMNP has a close focus on regenerating the Town Centre, and identifies New Milton Town Centre Opportunity Area for the purpose of supporting the following redevelopment opportunities to deliver residential, retail, cultural and health uses. In terms of housing, a number of potential sites have been identified as capable of delivering in the region of 250 houses, including:
  - New Milton Station
  - Manor Road Station Road
  - Osborne Road Station Road
  - Station Road Spencer Road
  - Station Road Elm Avenue
  - Old Milton Road Crossmead Avenue
- 5.40 A heritage and information centre, a cultural and community hub, a health and wellbeing centre and an innovation/business centre have also been allocated on further previously developed town centre sites.
- 5.41 In addition, previously developed land associated with the former minerals workings at Caird Avenue has been allocated for mixed-use development comprising business and food retail uses and green infrastructure. Rural exception housing schemes that meet the development plan definition will also be supported within or adjoining the rural settlement of Bashley.
- 5.42 The NMNP has an overarching ambition to attract a younger demographic profile (individuals, couples and families) to live and work in the town. This reflects the District Council's Spatial Strategy as described in the Core Strategy<sup>10</sup>. Policy NM2 (Diversifying Housing) will make a major contribution to attracting households aged under 40 to live in New Milton through supporting a mix of housing in the Neighbourhood Plan. This includes through seeking to ensure that proposals for all residential development include in their housing mix a type and tenure suitable for first time buyers or those looking to rent their first home, and that sites of 100 homes and more: include homes suitable for first time buyers or those looking to rent their of discounted starter homes; undeveloped, serviced plots are made available individually for purchase by self-builders; and include homes specifically developed for private rent. This will positively contribute towards meeting local housing needs.

<sup>&</sup>lt;sup>10</sup> NFDC Core Strategy

- 5.43 Policy NM1 (A Spatial Plan for New Milton) directs all major development to the town of New Milton, responding to the Town Council's Retail Study (2017), which recognises that to attract households aged under 40 to live in the town (and to reduce their dependence on other towns) a corresponding shift in the provision of retail, leisure, recreation, education/early years, health and cultural facilities and services is required. In this context, Policy NM18 (Education) encourages an increase in education capacity to serve a growing school-age population. Additionally, policy NM17 (Early Years Facilities) supports proposals to develop new day nursery or similar forms of early years education, or to change the use of other buildings for this purpose. This is in response to the fewer current childcare places as a proportion of its adult population than is normal for this size of town. Improved access to childcare, education and other key services in the town is also expected to deliver long term significant positive effects on the community.
- 5.44 The Town Centre Retail Study (2017) highlights that a revamped Memorial Centre could provide a key public realm function and focal point and plays an enhanced role in developing the social interaction in the town centre. Increasing proximity to essential social infrastructure will appeal to young people and families, increasing the attractiveness of the town to the under 40 age group. This is reflected by Policy NM7, which seeks to develop a cultural and community hub at this location.
- 5.45 Policy NM15 (Employment) seeks to prevent the unnecessary loss of existing employment land beyond the proposals contained in the NMNP. Supporting this Policy NM3 (Land at Caird Avenue) seeks to deliver employment land in a competitive location for the town, generating approximately 150 new jobs in addition to retaining almost 100 jobs currently available on site. This will maintain and enhance local employment opportunities for residents, contributing towards a thriving economy.
- 5.46 All development proposed for New Milton through the Neighbourhood Plan (and the New Local Plan) is supported by specific policies which seek to deliver improved access for residents to employment and services (e.g. health facilities and the railway station). This includes through public realm enhancements and infrastructure provision. In this context, Policy NM12 (Promoting Walking and Cycling) encourages the provision of new cycleways and footpaths to connect the new residential and employment developments on the edges of the town with the town centre. This will facilitate enhanced and safe sustainable access, reducing congestion in the centre, and delivering long term significant positive effects on the community through supporting the vitality of the area.
- 5.47 The value of the visitor and tourism economy to the Neighbourhood Plan area is provided with a close focus by the Neighbourhood Plan. This includes through the proposals for Policy NM5 (New Milton Town Centre Regeneration Area) which promote new visitor provisions in the town centre and Policy NM16, which supports new visitor accommodation in the Neighbourhood Plan area. Policy NM13 (Barton-on-Sea), which seeks to ensure the key design characteristics of the coast are maintained and enhanced, placing particular focus on the seafront and the gardens will also support the visitor economy. In this context the protection of features such as the openness of frontage, views and skyline will have a long-term significant positive effect on the visitor economy by ensuring the coastal tourism offer is maintained and enhanced, preserving the central focus on the sea front with its café/shop.
- 5.48 The NMNP is therefore predicted to have a long term significant positive effect in relation to the Population and Community theme. This includes through supporting the regeneration of the town centre, increasing the availability of housing for younger people, promoting the quality of life of residents, and improving the viability and vitality of the Neighbourhood Plan area's economy and service offer.

# **Health and Wellbeing**

5.49 The delivery of high quality pedestrian and cycle links in the Neighbourhood Plan area will support the use of healthier modes of travel as a viable alternative to the private car and promote healthier lifestyles. In this context Policy NM12 (Promoting Walking and Cycling) sets out a range of provisions which will promote walking and cycling in the Neighbourhood Plan

area. This includes through supporting proposals which seek to create new walking and cycling routes, connecting existing and new residential areas on the edge of the town with the town centre and facilitating financial contributions to footway and cycleway improvement projects. The policy will be further supported by Policy NM4 (Design Quality), which requires that new development create a *"pedestrian-friendly layout that is safe, well connected, legible and accessible"* and Policy NM5 (New Milton Town Centre Regeneration Area), which seeks to ensure that new development proposals in the town centre meet the needs of pedestrians, cyclists and public transport users, and that widened footpaths, attractive pedestrian and cycle crossings, the introduction of areas of shared space, street planting and junction improvements are implemented to support modal shift.

- 5.50 Health and wellbeing will be further supported by the policies promoting green infrastructure enhancements. In this context Policy NM3 (Land east of Caird Avenue), PolicyNM4 (Design Quality), Policy NM11 (Mitigating Effects on European Sites), Policy NM12 (Promoting Walking and Cycling), Policy NM13 (Barton-on-Sea) will support the ongoing development of high quality multifunctional green infrastructure networks throughout the Neighbourhood Plan area.
- 5.51 Policy NM13 (Barton-on-Sea) seeks to ensure the key design characteristics of the coast are maintained and enhanced, placing particular focus on the seafront and the gardens. Protection of features such as the openness of frontage, views and skyline, and the grassed plateau, will have a long term significant positive effect on the health and wellbeing of residents by ensuring the recreational offer is maintained and enhanced. The grassed plateau in particular is public open space and mostly utilised for walking, sitting and peaceful enjoyment, providing numerous health benefits for residents and visitors.
- 5.52 In terms of health facilities in the area, Policy NM8 (Health & Wellbeing Centre) identifies a Health & Wellbeing Centre as a Town Centre redevelopment scheme. Development proposals linked to the centre will be supported for the co-location of health and wellbeing services and for an expanded facility to serve a larger and more diverse local community.
- 5.53 Given the Neighbourhood Plan's focus on pedestrian, cycle and green infrastructure network enhancements, improvements to the public realm and the delivery of new health provision in the Neighbourhood Plan area, the NMNP is anticipated to have a **medium and long term** significant positive effect on health and wellbeing.

# **Transportation**

- 5.54 The existing main patterns of movement generated from within the town are car-based, comprising mostly one of three types of trip; out-commuting from across the town to Southampton and Dorset, shopping trips from suburbs to the town centre, and the school run. In addition, there is traffic passing through the town on the east-west A337, with considerable congestion at peak hours on the road system, especially on roads heading north to the A35 and Gore Road/A337 heading west. The congestion on Station Road/Ashley Road through the town centre is common across the day.
- 5.55 In light of the proposed housing, employment and retail growth for the area, the Town and Retail Study (2017) stresses that *"improved access via foot/cycle/bus will be needed to relieve the anticipated added pressure to the road network"*. In addition, the recent report 'High Street UK 2020' confirms that improving the quality and visual appearance of a town centre is second in a list of 25 priorities that should be actioned locally to increase footfall.
- 5.56 Responding to this, the Policy NM12 (Promoting Walking and Cycling) sets out a range of provisions which will promote walking and cycling in the Neighbourhood Plan area. This includes through supporting proposals which seek to create new walking and cycling routes, connecting existing and new residential areas on the edge of the town with the town centre and facilitating financial contributions to footway and cycleway improvement projects. The policy will be further supported by Policy NM4 (Design Quality), which requires that new development create a *"pedestrian-friendly layout that is safe, well connected, legible and accessible"* and Policy NM5 (New Milton Town Centre Regeneration Area), which seeks to ensure that new development proposals in the town centre meet the needs of pedestrians, cyclists and public transport users, and that widened footpaths, attractive pedestrian and cycle crossings, the

introduction of areas of shared space, street planting and junction improvements are implemented to support modal shift.

- 5.57 Walking and cycling will be further supported by the policies promoting green infrastructure enhancements. In this context Policy NM3 (Land east of Caird Avenue), Policy NM4 (Design Quality), Policy NM11 (Mitigating Effects on European Sites), Policy NM12 (Promoting Walking and Cycling), Policy NM13 (Barton-on-Sea) will support the ongoing development of high quality multifunctional green infrastructure networks throughout the Neighbourhood Plan area.
- 5.58 There is also potential for the number of people working or running a business from home to increase due to modern working patterns such as agile and flexible working. This is supported through Policy NM19 (Connecting the Town), which seeks to ensure all housing and employment schemes will be accompanied by the provision of high-speed broadband proposed. This would help reduce the need to travel, with benefits for traffic and congestion.
- 5.59 The use of sustainable modes of transport will also be supported by the Neighbourhood Plan's focus on the town centre. Through delivering high quality town centre neighbourhoods with a range of housing, employment and community uses, the Neighbourhood Plan will help limit the need to travel and promote walking, cycling and public transport use.
- 5.60 Overall, the NMNP is predicted to have **significant long term positive effect** on transportation. This is considering the localised transport measures proposed, alongside the potential for anticipated housing, employment and retail growth in the area to facilitate enhancements.

# Conclusions at this current stage

- 5.61 The assessment has concluded that the current version of the NMNP is likely to lead to **significant long term positive effects** in relation to the 'Population and Community', and 'Transportation' SA themes. These benefits largely relate to the NMNP's focus on enhancing the quality of life of residents through the regeneration of the town centre, seeking to deliver a range of housing types and tenures, including prioritising housing to attract a younger demographic profile, and improving accessibility to enhanced services and facilities. The NMNP will further support accessibility for residents and visitors through the protection and enhancement of green infrastructure networks in the Neighbourhood Plan area, an expansion of high quality local pedestrian/cycle networks, and enhancements to the public realm.
- 5.62 The NMNP plans positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, with particular focus placed on the European and national designations in the New Forest. In addition to supporting the natural environment, this will have benefits for residents and the visitor economy. In relation to the Neighbourhood Plan allocations at the Land at Caird Avenue and in the town centre, it is expected that potential effects will be mitigated through the detailed design provisions identified through Policy NM3 (Land at Caird Avenue) and other relevant policies identified within the NMNP. These set out a range of provisions for facilitating biodiversity enhancements. In relation to the Local Plan Review allocations in the Neighbourhood Plan area, the NMNP provides additional provisions for protecting and enhancing ecological networks in these areas. As such overall long term **minor positive effects** in relation to the Biodiversity SA theme are anticipated as a result of the Neighbourhood Plan.
- 5.63 It is recognised that improvements in green infrastructure networks and ecological networks through the NMNP will lead to indirect **positive effects** on the 'Climate Change' and 'Land, Soil and Water' SA themes, through effective water management, pollution and climate control.
- 5.64 The NMNP has the potential to lead to residual **positive effects** in relation to the 'landscape and historic environment' SA theme. Whilst it is recognised that the strategic site allocations may lead to adverse effects upon the setting of the New Forest National Park, it is anticipated that these elements will be considered through the Local Plan Review, including its accompanying SA process, and mitigation measures delivered. In the case of Land at Caird Avenue, it is expected that adverse effects have the potential to be mitigated through the detailed masterplanning proposed through Policy NM3. It is also recognised that the

Neighbourhood Plan policies' focus on the protection of landscape character and local distinctiveness may further address adverse effects where they may arise, and secure enhancements. A further key element in relation to this SA theme is that the redevelopment of underutilised sites in New Milton town centre has significant potential to lead to enhancements in the quality of the public realm, townscape character and local distinctiveness in the town centre.

# 6. What are the next steps?

- 6.1 The NMNP (accompanied by this SA Report) has been submitted to New Forest District Council and the New Forest National Park Authority for subsequent Independent Examination. At Independent Examination it will be considered whether the plan is meets the 'basic conditions' for Neighbourhood Plans and is in general conformity with the emerging Local Plans.
- 6.2 If Independent Examination is favourable, the NMNP will be subject to a referendum, organised by New Milton Town Council and New Forest District Council. If more than 50% of those who vote agree with the NMNP, then the Neighbourhood Plan will be 'made'. Once made, the NMNP will become part of the Development Plan for New Milton parish.

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# Appendix A: Context Review and baseline

# **Air Quality**

# **Context Review**

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

In terms of the local context, New Forest District Council is required to monitor air quality across the county under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

# **Summary of Current Baseline**

There are no AQMAs within the NMNP area. The closest AQMA is approximately 11km to the northeast in Lyndhurst. The area covers part of the A35 (High Street) and has been designated for nitrogen dioxide.

Whilst air quality within the NMNP area is good, there are existing air quality issues in other areas of New Forest District due in the majority to road transport and industry. For example an AQMA has been declared in Lyndhurst. The Totton AQMA has recently been revoked.

# **Summary of Future Baseline**

Whilst no significant air quality issues currently exist within the NMNP area, new employment and or housing provision within the Neighbourhood area has the potential to have adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as nitrogen dioxide.

Areas of particular sensitivity to increased traffic flows are likely to be town and village centres and the routes with the largest congestion issues. However these effects may be offset in part by factors such as measures implemented through actions to reduce air quality issues by New Forest District Council and Hampshire County Council.

# **Biodiversity and Geodiversity**

# **Context Review**

The Fourth Ramsar Strategic Plan<sup>11</sup> (2016-2024) aims to be congruent with the 2015 Sustainable Development Goals (SDGs) implemented by the United Nations, since wetlands contribute towards a very broad range of the aspirations set out in the SDGs. The vision for the plan is as follows, with three strategic goals and one operational goal seeking to achieve this vision:

'Wetlands are conserved, widely used, restored and their benefits are recognised and valued by all'

- Goal 1 (Strategic): Addressing the drivers of wetland loss and degradation;
- Goal 2 (Strategic): Effectively conserving and managing the Ramsar Site network;
- Goal 3 (Strategic): Wisely using all wetlands; and

<sup>&</sup>lt;sup>11</sup> Ramsar Convention (2016): 'The Fourth Ramsar Strategic Plan 2016-2024', [online] available to download via: <<u>http://www.ramsar.org/about/the-ramsar-convention-and-its-mission</u>> last accessed [27/02/17]

• Goal 4 (Operational): Enhancing implementation.

At the European level, the EU Biodiversity Strategy<sup>12</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

A Site Improvement Plan (SIP) was developed for the New Forest SAC and New Forest SPA. Within the SIP there are a range of policy/plan objectives which aim to improve the quality of the Nature 2000 sites within the New Forest.

The Natural Environment White Paper (NEWP)<sup>13</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'<sup>14</sup>.

Policy CS3 of the New Forest Core Strategy, for New Forest District outside the National Park, is titled 'Protecting and enhancing our special environment (Heritage and Nature Conservation)'. The Policy

<sup>&</sup>lt;sup>12</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <<u>http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\_resolution\_april2012.pdf</u>> last accessed [30/01/17]
<sup>13</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at:

<sup>&</sup>lt;a href="http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf">http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf</a>> last accessed [30/03/17] <sup>14</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <a href="https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services">https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services</a>> last accessed [03/04/17]

supports ongoing surveys of habitats and species, as well as the designation of Sites of Importance for Nature Conservation. The Policy also seeks to enhance the special characteristics of the area, including through encouraging land management practices to restore or enhance sites of biodiversity value, and ensuring development contributes where possible to biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for.

# **Summary of Current Baseline**

# European Designated Sites (Ramsar Sites/SPA/SAC)

The Convention on Wetlands of International Importance (the Ramsar Convention) is the intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. The convention was adopted in 1971 and came into force in 1975. In the UK, the initial emphasis was on selecting sites of importance to waterbirds, and consequently, many Ramsar Sites were also designated as Special Protection Areas (SPA) under the European Birds Directive (79/409/EEC).

A small area at the northern extent of the NMNP area sits within the New Forest Ramsar site, New Forest SAC and New Forest SPA.

The northern edge of the NMNP area sits within the New Forest Site Improvement Plan (SIP) area, this area extends north to cover a large area adjacent to the NMNP area. The SIP was developed for the New Forest SPA and New Forest SAC. There are 15 issues targeted with specific actions, these include drainage, scrub clearance and transport, each of the 15 issues have actions ongoing, with some up to 2030<sup>15</sup>.

Key issues relating to European designated sites have been considered through the Habitats Regulations Assessment currently being undertaken for the Neighbourhood Plan.

# Nationally Designated Sites (SSSIs/NNRs)

The coastline at New Milton has an exceptionally rich and interesting geological area and the Highcliffe – Milford stretch of coastline within the NMNP area is recommended by Natural England as a Geological Place to Visit. The Highcliffe to Milford Cliffs SSSI is located at the south of the NMNP area, and runs along the coast. The SSSI is 9km in total, and covers steep coastal slopes and cliffs which are locally dissected b deeply incised ravines. The cliffs were notified under the Wildlife and Countryside Act 1981 in 1991, for their geological and biological interest. The cliffs provide excellent access to fossil rich beds, with fossils found from reptiles and plants. There are a range of biological interests in the SSSI including vegetation and invertebrates.

The Citation for the SSSI states:

"This coastal site provides access to the standard succession of the fossil rich Barton Beds and Headon Beds. Various exposures within the Site are considered important both in a national and international context. The principal features of interest are described below. The oldest rocks are described first. These rocks lie in the western part of the site, younger rocks being found progressing eastward."

# and

*"In addition to the geological interest the cliffs and coastal slopes of this site are of contemporary biological interest. Within the coastal slopes and broad cliff terraces there are runnels and pools partially vegetated by plants such as willow Salix species, reed mace <u>Typha latifolia</u>, coltsfoot <u>Tussilago farfara</u> and cross-leaved heath <u>Erica tetralix</u>. These areas of open vegetation are the habitat of a range of invertebrates strongly associated with soft cliffs. There is a particularly rich assemblage of beetles including <u>Drypta dentata</u> and <u>Colon serripes</u>. The rare cranefly <u>Eonomyia conoviensis</u> is also present within the undercliff vegetation."* 

<sup>&</sup>lt;sup>15</sup>Natural England (2014) Site Improvement Plan: New Forest (SIP147) [online database] available to access via: <<u>http://publications.naturalengland.org.uk/publication/5174614971908096</u>> last accessed 19/04/17

The Highcliffe to Milford Cliffs SSSI is split into seven units, with a range of the conditions, which were assessed in 2011<sup>16</sup>. Four of the units are unfavourable due to poor/inappropriate coastal management and the remaining three units were classified as favourable.

The most northerly part of the NMNP area sits within the New Forest SSSI which extends north beyond the NMNP boundary, and covers almost 30 hectares. 54% of the areas are favourable and 43% were designated as unfavourable but recovering. The New Forest SSSI was notified under the Wildlife and Countryside Act 1981 in 1987 and was last revised in 1996. The NMNP extends into units 528 – Wotton Lawns which is favourable, 229 – Malbrorough Deeps which is unfavourable – recovering and 538 – Little Wootton which is also unfavourable and recovering but classified under high threat level<sup>17</sup>.

# The Citation for the SSSI states;

"The New Forest embraces the largest area of "unsown" vegetation in lowland England and includes the representation on a large scale of habitat formations formerly common but now fragmented and rare in lowland Western Europe. They include lowland heath, valley and seepage step mire, or fen, and ancient pasture woodland, including riparian and bog woodland. Nowhere else do these habitats occur in combination and on so large a scale. There are about 4,600 hectares of pasture woodland and scrub dominated by oak, beech and holly; 11,800 hectares of heathland and associated grassland; 3,300 hectares of wet heath and valley mire-fen and also 8,400 hectares of plantations dating from various periods since the early 18th century. Within this matrix of habitats are a range of acid to neutral grasslands where the vegetation owes much to the local geology and continuous grazing, a situation which is uncommon in lowland England. Scattered around the New Forest and throughout the small pockets of enclosed farmland are a series of unimproved meadows which have similarities with these open Forest grasslands."

Nearby are also the Burton Common SSSI and the Hurst Castle and Lymington River Estuary SSSI.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The entirety of the NMNP area sits within an IRZ for one or more of the previously mentioned SSSIs, either within the NMNP area or within the vicinity of the NMNP area. As such, planning applications for residential development exceeding certain thresholds may need to be assessed against the potential impact to the SSSIs.

# Locally Designated Sites (LNRs/LWS/County Wildlife Sites)

Sites of Importance for Nature Conservation (SINCs) are a local designated site used in Hampshire to conserve important and distinctive habitat and species which fall outside of European and national conservation designations<sup>18</sup>. Over 3,800 sites within Hampshire have been designated as SINCs, covering 9% of the county. There are 11 SINCs within the NMNP area, and are listed as follows:

- Chewton Glen Farm Meadow (1.9ha) designated for grassland and wetlands;
- Walkford Moor Copse and Castleford Copse (11.1ha) designated for woodland;
- Great Woar Copse South (1.5ha) designated for woodland;
- Great Woar Copse (0.4ha) designated for woodland;
- Lake Grove Road Meadowland (2.9ha) designated for grassland and wetlands;
- Barton Common (12.16ha) designated for heathland;

<htps://designatedsites.naturalengland.org.uk/SiteUnitList.aspx?SiteCode=s1003036&SiteName=&countyCode=&responsible Person=&unitId=&SeaArea=&IFCAArea=> last accessed 12/04/17

<sup>&</sup>lt;sup>16</sup> Natural England Designated Sites View: Highcliffe to Milford Cliffs SSSI Unit List. [online database] available to access via: <<u>https://designatedsites.naturalengland.org.uk/SiteUnitList.aspx?SiteCode=s1003036&SiteName=&countyCode=&responsible</u> <u>Person=&unitId=&SeaArea=&IFCAArea=></u> last accessed 12/04/17

<sup>&</sup>lt;sup>7</sup> Natural England Designated Sites View: The New Forest SSSI Unit List. [online database] available to access via:

<sup>&</sup>lt;sup>18</sup> http://www.hampshirebiodiversity.org.uk/pdf/Other%20reports/SINC%20web.pdf

- Barton Common North (3.2ha) designated for woodland and notable species;
- Becton Bunny (7.07ha) designated for heathland;
- Stanley's Copse (4.78ha) designated for woodland;
- Carrick Way Woodland (22.3ha) designated for woodland; and
- Ashley Meadows (3.48ha) designated for grassland and wetland.

# Biodiversity Action Plan Priority Habitats

<sup>'</sup>Priority Habitats' are those which are characteristic of Hampshire and for which Hampshire makes a significant contribution to the UK aims of the Biodiversity Action Plan<sup>19</sup>. Key areas of BAP Priority Habitat in the NMNP area include:

- Lowland dry acid grassland, to the south east of the NMNP area, adjacent to the Barton-on-Sea Golf Club;
- Ancient and semi natural woodland, in six small areas spread across the north of the NMNP area; and
- Wood pasture and parkland, in two areas, adjacent to the Barton-on-Sea Golf Club and another area also in the south east, near Ashley Manor Farm.

As highlighted above, the designated sites of interest within the NMNP area supports populations of a number of internationally important species listed in Annex II of the European Habitats Directive (92/43/EEC) and Annex I of the European Birds Directive.

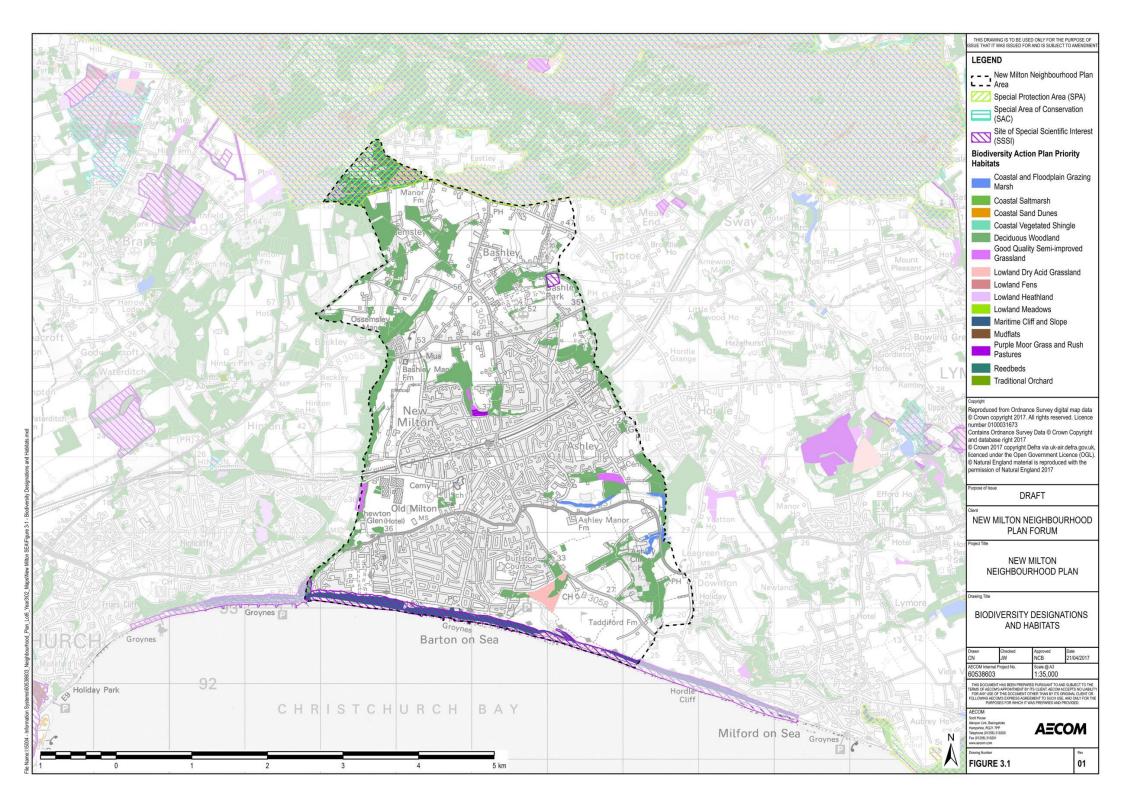
The Neighbourhood Plan area has a strong geological interest, with Palaeogenic deposits exposed along the coast, revealing internationally recognised fossil fauna. These fossils are overlain by gravels which produce acidic soils, which in turn support the habitats and species which have been designated under Natura 2000, and is one of the most important and extensive habitats of this type in lowland Europe.

# **Summary of Future Baseline**

Habitats and species have the potential to come under increasing pressures from housing and infrastructure development in the Neighbourhood Plan Area, including European and nationally designated sites. This includes a loss of habitats and impacts on biodiversity networks. This may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making, including sub-regional green infrastructure work being undertaken by Natural England, New Forest District Council, New Forest National Park Authority, Hampshire County Council and other organisations

<sup>&</sup>lt;sup>19</sup> MAGIC (2017): 'Interactive Map – Habitats and Species' [online database] available to access via: <<u>http://www.magic.gov.uk/MagicMap.aspx</u>> last accessed [04/04/17]



# Climate Change

# **Context Review**

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'<sup>20</sup>

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The UK Climate Change Act<sup>21</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.

The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page<sup>22</sup>.

Key messages from the National Planning Policy Framework (NPPF) include:

• Support the transition to a low carbon future in a changing climate as a 'core planning principle'.

There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008<sup>23</sup>. Specifically, planning policy should support the move to a low carbon future through:

<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> last accessed [27/01/17] <sup>21</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<u>http://www.legislation.gov.uk/ukpga/2008/27/contents</u>> last accessed [21/02/17] <sup>22</sup> Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<u>https://www.theccc.org.uk/tackling-</u>

<sup>&</sup>lt;sup>20</sup> GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<sup>&</sup>lt;sup>22</sup> Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<u>https://www.theccc.org.uk/tackling-</u> climate-change/preparing-for-climate-change/uk-adaptation-policy/> last accessed [21/02/17]

- Planning for new development in locations and ways which reduce GHG emissions;
- Actively supporting energy efficiency improvements to existing buildings;
- Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
- Positively promoting renewable energy technologies and considering identifying suitable areas for their construction: and
- Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be . allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of • factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act<sup>24</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of . land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS)<sup>25</sup>

Further guidance is provided in the document 'Planning for SuDs'.<sup>26</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local guality of life and green infrastructure'.

A Strategic Flood Risk Assessment was produced in 2007 for the New Forest District. This included the assessment of potential flood risk in a climate change scenario. The assessment covers current planning context at all levels EU, national, regional and local. The assessment investigates historical flooding from waterbodies, ground water and sea flooding to examine current flood risk in the area. Also included in the assessment are flood management measures and guidance for the preparation of flood risk assessments with regard to proposed developments. Additionally, the Hampshire Local Flood Risk Management Strategy (2013-2028)<sup>27</sup> aims to reduce and manage flood risk in a way that will benefit people, property and the local environment. This report calls for considering flooding in a wider context including the downstream effects of decisions made in specific locations and wider catchment effects. It also aims to secure 'multiple benefits' and deliver sustainability and Water Framework Directive benefits wherever possible in the decision making process for delivering flood risk management infrastructure.

One of the Local Plan Core Strategy Objectives for the Plan Area is related to Climate change, and is as follows;

<sup>&</sup>lt;sup>23</sup> The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO<sub>2</sub> emissions of at least 26% by 2020, against a 1990 baseline.

<sup>&</sup>lt;sup>4</sup> Flood and Water Management Act (2010) [online] available at: http://www.legislation.gov.uk/ukpga/2010/29/contents

<sup>&</sup>lt;sup>25</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs. <sup>26</sup> CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via

<sup>&</sup>lt;a href="http://www.ciria.org/Resources/Free\_publications/Planning\_for\_SuDS\_ma.aspx">http://www.ciria.org/Resources/Free\_publications/Planning\_for\_SuDS\_ma.aspx</a>> last accessed [04/04/17] <sup>27</sup> Hampshire County Council (2013): 'Local Flood Risk Management Strategy',:[online] available to download via: <http://documents.hants.gov.uk/flood-water-management/LFRMSdocument.pdf > last accessed [30/01/18]

# 2. Climate Change and Environmental Sustainability:

"To minimise the impact of local factors contributing to climate change, including minimising the use of non-renewable energy and natural resources; and to assess the implications on the plan area of climate change and develop appropriate local responses than minimise any harmful local impacts".

# **Summary of Current Baseline**

# Contribution to Climate Change

In relation to GhG emissions, source data from the Department of Energy and Climate Change suggests that New Forest District has had slightly higher per capita emissions total than that of both the South East of England and England as a whole since 2005 (see **Table 4.1**). New Forest District has also seen a 19.3% decrease the percentage of total emissions per capita between 2005 and 2012, higher than the reductions for the South East (15.9%) and England (16.7%).

# Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team<sup>28</sup>. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South East of England by 2050 for a medium emissions scenario<sup>29</sup> are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.8°C; and
- The central estimate of change in winter mean precipitation is 16% and summer mean precipitation is –19%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

# Flood Risk

<sup>&</sup>lt;sup>28</sup> The data was released on 18th June 2009: See: <<u>http://ukclimateprojections.metoffice.gov.uk/></u> last accessed [04/02/17]
<sup>29</sup> UK Climate Projections (2009) South East 2050s Medium Emissions Scenario [online] available at:
<<u>http://ukclimateprojections.metoffice.gov.uk/23907?emission=medium</u>> last accessed [28/03/17]

There are several areas in Flood Zone 3 in the NMNP area. Some sections of the coastline are in flood zone 3, to the east and west, and the central section of the coastline is categorised as flood zone 2. Whilst the areas adjoining the coast are at risk of flooding these areas of flood risk do not cover any existing properties.

The 'New Forest Catchment Flood Management Plan' (2009) states that the main risk to the NMNP area is from river flooding. The NMNP area sits within Milton/Milford sub area; in 2009 when the report was prepared, 77 properties were at risk of flooding, with a predicted 244 properties at risk of flooding by 2100.

Surface water flooding is a low to medium risk for some locations within the NMNP area. The areas at a medium to low risk in the areas tend to be those which are more urbanised. Sewer flooding is also a risk for some parts of the Neighbourhood Plan area, with sections of low-medium risk in the north western and south western parts of the area.

# **Summary of Future Baseline**

Climate change has the potential to increase the occurrence of extreme weather events in the NMNP area. This is likely to increase risks associated with climate change (including fluvial, coastal and drainage related flooding) with an increased need for resilience and adaptation. Additional future development has the potential to exacerbate flood risks.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk causes flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure.

The New Forest District Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency)<sup>30</sup> within the Neighbourhood Plan area within the future, for reasons such as surface water capacity issues.

In terms of climate change mitigation, GhG emissions generated in the NMNP area may decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the NMNP area would contribute to increases in absolute levels of GhG emissions.

# Landscape and Historic Environment

# **Context Review**

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

<sup>&</sup>lt;sup>30</sup> GOV.UK (2017): 'Flood Risk Assessment in Flood Zone 1 and Critical Drainage Areas', [online] available to view via:
<<u>https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas</u>> last accessed [06/04/17]

The Government's Statement on the Historic Environment for England<sup>31</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

*Policy CS1: Sustainable Development Principles* of the New Forest District Council Core Strategy stipulates that all new developments will be expected to contribute positively towards the sustainability of communities and to protecting and enhancing the environment within the Neighbourhood Plan area by minimising the risk of damage to areas of importance for nature conservation and/or landscape value, both directly and indirectly.

# **Summary of Current Baseline**

# Landscape

The northern boundary of the NMNP area borders the New Forest National Park, with a small area of the NMNP area lying within the National Park. The New Forest National Park was designated in 2005 and covers an area of approximately 566km<sup>2</sup>. The National Park was designated in part due to the range of rare and distinctive landscapes in the area, including ancient and ornamental woodland, heathlands and historic villages.

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within NCA Profile: 131 New Forest<sup>32</sup>. This NCA, of which 75% comprises the New Forest National Park, is described as a plateau, averaging 80-100m above sea level, comprised of Palaeogenic deposits. These deposits are exposed along the coast, as internationally recognised fossil fauna, overlain by Quaternary gravels. The gravels produce acidic soils, which support the habitats and species which have been designated under Natura 2000, and is one of the most important and extensive habitats of this type in lowland Europe.

A Landscape Character Assessment has been undertaken for the NMNP area, and has been presented in the New Milton Local Distinctiveness Supplementary Planning Document, which was adopted in 2010 and produced by New Forest District Council. In this assessment, 13 character areas within the NMNP area have been defined. These areas are;

- Town Centre
- Great Woar (North West New Milton)
- The Lanes (North East New Milton)
- Ashley
- South and East New Milton
- Caird Avenue
- Becton Bunny Valley
- Barton Sea Front
- Barton Gardens
- Old Milton
- Barton Court Avenue
- West Garden (The Pinetum)
- West Town

<http://publications.naturalengland.org.uk/publication/5545755456569344?category=587130> last accessed [16/04/17]

<sup>&</sup>lt;sup>31</sup> HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: <<u>http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference\_library/publications/6763.aspx</u>> last accessed [30/03/17]

<sup>&</sup>lt;sup>32</sup> Natural England (2013) National Character Area – New Forest. Available at:

A detailed analysis of each character area within the town was set out identifying the defining characteristics of each area. It focusses on the positive elements of each area, which should be used to inform new development proposals. Guidance is also given for each specific area which enables recognition of local distinctiveness and for its protection and enhancement when development proposals are considered.

# Historic Environment

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains no Grade I, or Grade II\* listed buildings; however there are 33 Grade II listed buildings in the NMNP area.

There are no scheduled monuments, registered battlefields or registered historic parks and gardens within the Neighbourhood Plan area.

Conservation Areas are designated because of their special architectural and historic interest<sup>33</sup>. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England34. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan.

One conservation area is located in the NMNP area, the Old Milton Green Conservation Area. This covers a small area in the vicinity of St Mary Magdalene Church and Church Lane. The conservation area was designated in June 1993, to protect the remaining parts of the original village. Milton grew up around the Church and Green as a stopping point on the coast road from Lymington to Poole, which was the main town before the growth of Bournemouth in the 1800s. The present road and property boundaries follow the historic pattern and can be traced on early maps. Two inns, the school, the smithy and other village shops were clustered round the Green to the north and east, but many services moved away as the town of New Milton grew following development nearer the railway. The Green is the focus of the area, but its historic character is at present marred by traffic and a clutter of signs and posts. Church Lane still retains a rural feel, with some old hedgelines surviving. There are important trees on the Green and nearby in the George car park. The extensive Rectory grounds contain valuable trees protected by a tree preservation order. Groups of trees in the churchyard and to the east of the Green are also significant.

The key features of the conservation area are as follows:

- The earliest reference to a chapel is in 1270 but the present Church of St Mary Magdalene has an ashlar tower dated to 1695. The remainder, in red brick, being an 1830 rebuilding of the medieval church which was further extended in 1928. It is the only listed building in the conservation area. Its 19th century churchyard walls are still largely intact.
- The George Inn, dated 1905, is an original, purpose-built inn which replaces an earlier building.
- The most attractive approach to the Green is from the south along Southern Lane. One thatched cob cottage survives at the southern end, along with other buildings of modest scale, such as Myrtle Cottage.
- The buildings opposite the Church lychgate establish the scale and character of Church Lane.
- The Victorian Rectory dated 1876 stands in secluded grounds with mature trees which provide a haven for wildlife.

<sup>&</sup>lt;sup>33</sup> Historic England (2017): 'Conservation Areas', [online] available to access via: <<u>https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/</u>> last accessed [27/03/17]

<sup>&</sup>lt;sup>34</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<u>https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/</u>> last accessed [27/03/17]

The view from the west over Fawcetts Field to the Rectory grounds and Church tower is important to the setting of the conservation area.<sup>35</sup>

A Conservation Area Appraisal or Management Plan has not been prepared for the Old Milton Green Conservation Area.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. The 2016 Heritage at Risk Register for South East England<sup>36</sup> only highlights Grade I and Grade II\* listed buildings outside of London, unless they are Grade II listed places of worship. As none of the listed buildings are places of worship it is uncertain whether any of the listed buildings within the NMNP area are likely to be at risk.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life - whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people. Additionally, the Historic Environmental Record (HER)<sup>37</sup> for Hampshire contains 146 records within the parish of New Milton of both designated and non-designated heritage assets. Notable are the amount of 'find spots' where Bronze Age and Iron Age artefacts have been uncovered. Additionally, some finds date back to the Neolithic and Palaeolithic eras.

The South West Green Belt covers much of the Neighbourhood Plan area. It was originally designated in 1982. The South West Hampshire Green Belt joins the South East Dorset Green Belt to provide a green belt surrounding the Christchurch/Bournemouth/Poole conurbation. As per the provisions of the NPPF, the five key purposes of the Green Belt are as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Whilst the green belt is not designated for landscape character, and is instead designated to prevent urban sprawl, it has provided a strong contribution to landscape character since designation.

# **Summary of Future Baseline**

New development in the Town Centre area, incorporating a mix of retail, residential (to increase footfall) and social meeting places such as cafes, restaurants and leisure amenities has the potential to transform New Milton's High Street, where many businesses suffer with the effects of online sales, into a vibrant Town Centre with an evening economy. This has the potential to bring benefits to the quality of the public realm.

New development outside of the town centre has the potential to lead to incremental but small changes in landscape and townscape character and guality in and around the NMNP area. This includes from the loss of landscape features and visual impact including through inappropriate design and layout. There is also the potential for effects on landscape/townscape character and quality in the vicinity of the road network due to an incremental growth in traffic flows.

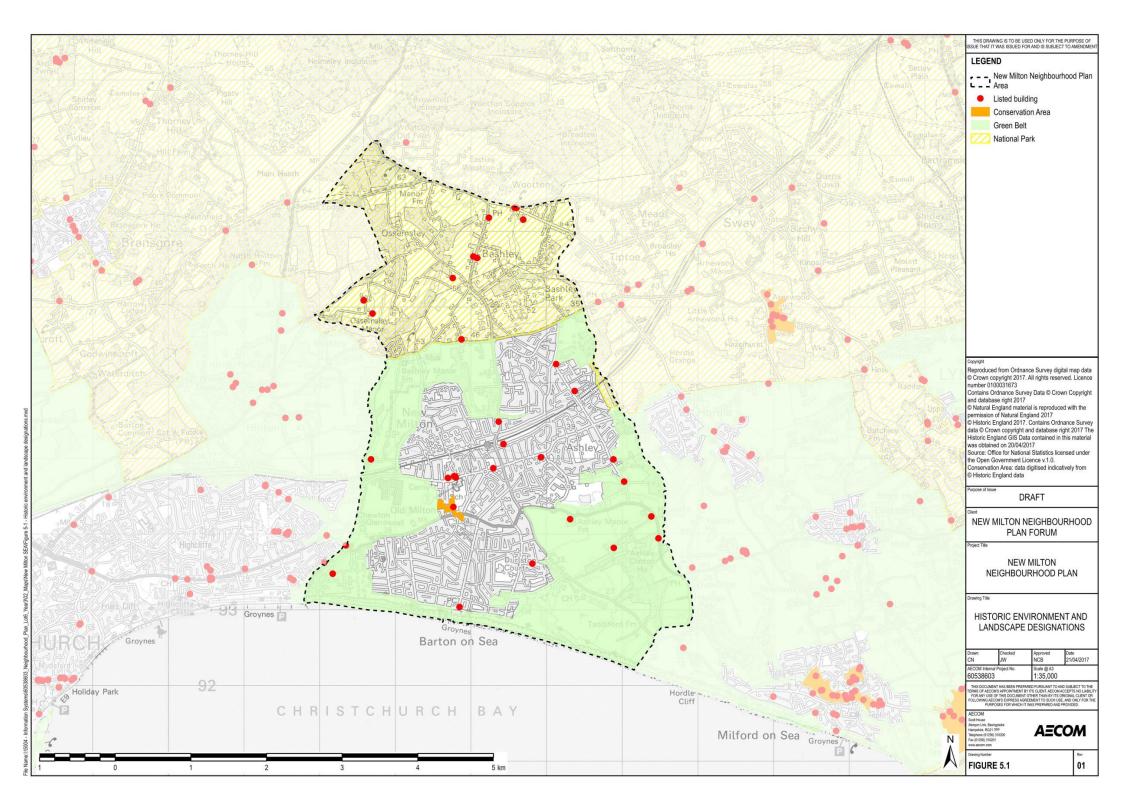
There are likely to be small scale and incremental changes in tranquility in and around the Neighbourhood Plan area, affected by changes in the levels of light and noise pollution. However new development need not be detrimental to the landscape and visual character of the NMNP area if designed sensitively

<sup>&</sup>lt;sup>35</sup> http://www.newforest.gov.uk/article/14330/Old-Milton-Green

<sup>&</sup>lt;sup>36</sup> Historic England (2016): 'Heritage at Risk 2016 Register – South East', [online] available to download via:

<sup>&</sup>lt;a href="https://www.historicengland.org.uk/images-books/publications/har-2016-registers/">https://www.historicengland.org.uk/images-books/publications/har-2016-registers/</a>> last accessed [29/03/17] <sup>37</sup> Hampshire County Council (2018): 'Historic Environmental Record Search', [online] available to access via:

<sup>&</sup>lt;<u>http://historicenvironment.hants.gov.uk/AHBSearch.aspx</u>> last accessed [01/03/18]



# Land, Soil and Water Resources

# **Context Review**

The EU's Soil Thematic Strategy<sup>38</sup> presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated . wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and .
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of • 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously • developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Published in February 2016, Part 1: 'Water for Life and Livelihoods'<sup>39</sup> of the updated River Basin Management Plan for the South East provides a framework for protecting and enhancing the benefits provided by the water environment. The priority issues within the New Forest catchment are diffuse pollution, morphology (loss of natural processed, flood plain and habitat connectivity) and enhancing high-value biodiversity. In this context, the Management Plan outlines a variety of environmental outcomes with the aim of achieving these by 2021.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>40</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>41</sup>, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government

Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from:

<sup>&</sup>lt;sup>38</sup> European Commission (2006) Soil Thematic Policy [online] available at: <<u>http://ec.europa.eu/environment/soil/index\_en.htm</u>> last accessed [30/01/17]

Defra & Environment Agency (2016): 'South East River Basin District River Basin Management Plan', [online] documents available to access via: <a href="https://www.gov.uk/government/publications/south-east-river-basin-district-river-basin-management-basin-management-basin-management-basin-management-basin-management-basin-management-basin-basin-management-basinplan> last accessed [27/02/18]

<sup>&</sup>lt;a href="https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england">https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england</a> last accessed [30/01/17] <sup>41</sup> Defra (2011) Water for life (The Water White Paper) [online] available at <<u>http://www.official-</u> documents.gov.uk/document/cm82/8230/8230.pdf> last accessed [30/01/17]

Review of Waste Policy in England<sup>42</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

# Summary of Current Baseline

# Land Quality

The Neighbourhood Plan area does not have a history of heavy industrial land use. However in 2005 a significant pollution incident occurred within the south west NMNP area, the incident involved specific waste materials was recorded by the Environment Agency under the EC Integrated Pollution Prevention and Control Directive (IPCC)<sup>43</sup>. This was the only incident recorded, and occurred within the Old Milton area. This event was only classified as significant and not major, which means that it was a less severe event, but may have caused significant damage to the ecosystem, agriculture and or commerce and a reduction in amenity value.

#### Quality of Agricultural Land

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality.

In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken within the Neighbourhood Plan area. Based on the 1:250,000 series of ALC maps produced by Natural England<sup>44</sup>, the NMNP area is in the majority non-agricultural uses. However there are some areas which are classified as Grade 2 'best and most versatile' land; this incorporates an area towards the south east of the NMNP area adjacent to Ashley Manor Farm. There are other nearby areas of land classified as Grade 3a agricultural land, which is also land classified as the 'best and most versatile' agricultural land. Other areas towards the north of the NMNP area are classified as Grade 3b land, with a small area by the New Milton School and a small area near Stanley Park also classified as Grade 3a land.

#### Watercourses

The NMNP area contains three main watercourses;

- The Becton Bunny is located in the south of the NMNP area and runs through the golf course before joining the sea.
- The Walkford Brook, which runs down the western boundary for the NMNP area, originates in the New Forest area further north
- The Ballard Watermeadows, comprises a range of small watercourses and a lake/pond. This is located in the centre of the NMNP area, just north of the railway station.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. There are no SPZs covering the NMNP area.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs), and as such, they are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination.

<sup>&</sup>lt;sup>42</sup> Defra (2011) Government Review of Waste Policy in England [online] available at:

<sup>&</sup>lt;a href="http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf">http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf</a>> last accessed [30/01/17]
<a href="http://apps.environment-agency.gov.uk/wiyby/default.aspx">http://apps.environment-agency.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf</a>> last accessed [30/01/17]
<a href="http://apps.environment-agency.gov.uk/wiyby/default.aspx">http://apps.environment-agency.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf</a>> last accessed [30/01/17]
<a href="http://apps.environment-agency.gov.uk/wiyby/default.aspx">http://apps.environment-agency.gov.uk/wiyby/default.aspx</a>> last accessed [20/03/17]

<sup>&</sup>lt;sup>44</sup> Natural England (2011): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to download via: <<u>http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736</u>> last accessed [30/03/17]

NVZs for 2017-2020 started on January 1<sup>st</sup> 2017<sup>45</sup>, including new areas of NVZs and excluding areas that have been de-designated.

A small area in the far north east of the NMNP area is covered by an NVZ. A wide area adjacent to the NMNP area is also designated as a NVZ, to the north and east.

# Summary of Future Baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies.

# **Population and Community**

# **Context Review**

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning
  authorities should be responsive to local circumstances and plan housing development to reflect
  local needs, particularly for affordable housing, including through rural exception sites where
  appropriate. Authorities should consider whether allowing some market housing would facilitate
  the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

<sup>&</sup>lt;sup>45</sup> GOV.UK (2017): 'Nutrient Management: Nitrate Vulnerable Zones' [online] available to access via: <<u>https://www.gov.uk/guidance/nutrient-management-nitrate-vulnerable-zones</u>> last accessed [17/03/17]

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>46</sup> warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'.* The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The New Forest Core Strategy presents a range of policies related to population and community.

Policy CS8 Community services and infrastructure states:

- "New Forest District Council will work with service and infrastructure providers with the aim of ensuring the delivery of adequate infrastructure and services, (Chapter 10 and the Delivery Plan) to serve existing and proposed development in the Plan Area and support the local economy, ensuring that any adverse impacts arising are minimised, and that decisions on the provision of such infrastructure are taken on the basis of environmental sustainability as well as cost. Attention will be given to addressing the needs of areas of particular social deprivation. "
- "Proposals for new and improved health care, education and social facilities that result in improvements in meeting the needs of the Plan Area's population will be supported. "
- "These facilities should be well related to public transport infrastructure, and should provide high standards of accessibility to all sectors of the community. In rural communities and other areas with poor public transport, support will be given to innovative schemes to secure the local delivery of public services. Delivery of some services through the use of mobile services and technology will be encouraged where this results in better local provision. "
- "There will be a presumption against any development that involves the loss of education, health, social and other publicly provided community services, except where it is part of a service provider's plans to provide improved local services in equally accessible locations."

Policy CS13 Housing types, sizes and tenure states:

"All new residential development should address the housing needs of local people by:

- maximising the provision of additional affordable housing within the overall provision of new residential development;
- ensuring new residential development includes housing suitable for newly forming local households;
- requiring dwellings, including small dwellings, to be designed to provide flexible accommodation which is capable of future adaptation;
- providing additional family housing in the social-rented sector; and
- providing housing which meets the needs of older people (in accordance with policy CC5 of the South East Plan)."

Policy CS14 Affordable Housing provision sets out the Council's target of providing at least 100 additional affordable houses per year within the district.

<sup>&</sup>lt;sup>46</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <<u>http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/</u>> last accessed [03/02/17]

# **Summary of Current Baseline**

#### Population

According to the most recent census data available, the population in 2011 in New Milton was 25,313, which was an increase of 6.2% from 2001. In comparison the population of New Forest District saw an increase of 4.1% in the same time period. However population increase in the Neighbourhood Plan area was lower than the 7.9% increase seen in the South East and England.

#### Age Structure

New Milton has a significantly higher proportion of the population within the 60+ age group (37.4%) when compared with the national average of 22.3%, the regional average of 23.3% and the district average of 32.9%. The parish also has a lower percentage of residents within the 0-15 and 16-24 age groups than district, South East and national averages. The proportion of residents within the 25-44 age groups (19%) slightly lower than the New Forest District average of 21% and significantly lower than South East (26.5%) and England (27.5%) averages.

The population of the Neighbourhood Plan area is ageing. Population increase within the Neighbourhood Plan area within the 30-59 age groups has been lower than that of New Forest, regional and national averages. However the rate of increase in population within the 65+ age groups has been significantly higher than all comparators. The NFDC Local Plan forecasts that, under a do nothing scenario, New Milton is predicted to change from a third of people being over 65 to potentially half by 2036.<sup>47</sup> The population increase in the Neighbourhood Plan area is mainly as a result of inmigration of older age groups. As such an ageing population has been accelerated as a result of this factor, combined with low birth rates.

#### Economy

The Local Plan Review Sustainability Appraisal Scoping Report (NFDC 2015) describes the economy of the Southern Coastal Area of New Forest District which includes the parish of New Milton. The information below is taken from that report.

The area is characterised by relatively high levels of employment in accommodation, food services and health. The higher percentage of employment in health, which is three-times the level in Avon Valley and Downlands Area, is likely to follow from the high proportion of elderly residents in this part of the District. The prevalence of accommodation and food services in this area stems from the presence of many guest houses, caravan parks and other holiday accommodation.

The vast majority (98%) of businesses in the District are micro (0-9 employees - 88.6%) or small (10-49 employees – 9.3%) in size and there is a high percentage of self-employment (12.5%, compared with 11% for the region and 9.9% nationally). At around 7,700, the District has the highest number of active businesses of any local authority in Hampshire. This provides for a relatively high business density which is an indication of a competitive local economy.

Despite this jobs within New Forest District as a whole are relatively poorly paid and a long way below the Hampshire and regional figures. More than 60% of District residents in work earn less than the average UK wage of £26,500.

Unemployment and income factors are influential in determining areas suffering deprivation. Milton Parish, along with Pennington and Totton, fall within the 40% of most deprived wards in the UK.

Within the New Milton town centre the number of vacant units has increased over the past ten years from around 4% of units in 2004 to around 9% in 2013 and New Milton shows a marked trend towards higher vacancy levels compared to other centres in the District. The high number of charity shops in New Milton is an indication of the lack of demand from other retailers.

<sup>&</sup>lt;sup>47</sup> NFDC Local Plan Review 2016-2036. Part 1 Planning Consultation

# House prices and affordability

The Local Plan Review Sustainability Appraisal Scoping Report (NFDC 2015) describes the housing and affordability needs of the Southern Coastal Area of New Forest District which includes the parish of New Milton. The information below is taken from that report.

House prices in New Forest District are high. The average price of a property, at £315,800, is considerably more expensive than the county (£221,900) and regional (£229,200) averages. Analysis of house prices compared with lower local earnings shows that housing affordability is consistently worse in the District compared with County and regional averages. To be able to afford a home, within the lowest quarter of prices, a household earning within the lowest quarter of salaries in the area would need to borrow nearly 10 times its income.

The need for affordable homes in the District is assessed to be 525 households per annum and the need for additional homes is assessed to be 567-687 per annum; almost all of the current housing need is therefore for affordable homes (New Forest District Council Local Plan Review Part 1 Strategy consultation report).

The Council's Homesearch Register is a preference-based waiting list and allocation scheme for housing in the District. Most vacancies in council housing or housing association properties are allocated from the Register according to the priority awarded to the applicant, and the length of time on the Register. There are 1 258 people on the Register for New Milton, 60% of which are looking for 1 bed accommodation and are likely to be young people or young couples.

The 2011 Census showed that more than 30% of all households in the District consisted entirely of people aged 65 and over, much higher that the regional (22%) and national (21%) percentages. There were 61 care homes providing around 1,500 places in the District. The majority of District provision (63%) is to be found in the southern coastal area of the District with more than 40% located in New Milton parish- particularly in Barton-on-Sea.

# Household Deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment**: Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education**: No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing**: The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on the most recently available census data, 61.3% of households within the parish are deprived in some way, which is 8.2% higher than the average for New Forest District (53.1%), and also 9% higher than regional averages and 3.9% higher than national averages. The percentage of households within the parish which fall within the 'deprived in 1 dimension', and 'deprived in 2 dimensions' is also higher than the percentages observed for the district, South East and England. However, the proportion of households within the 'deprived in 3 dimensions' and 'deprived in 4 dimensions' categories are below the regional and national averages (although higher than district averages).

# Index of Multiple Deprivation

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

 Income: The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).

- **Employment**: The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- Education, Skills and Training: The lack of attainment and skills in the local population.
- Health Deprivation and Disability: The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- Crime: The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services**: The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - 1. 'Geographical Barriers': relating to the physical proximity of local services
  - 2. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment**: The quality of the local environment, with indicators falling categorised in two sub-domains.
  - 1. 'Indoors Living Environment' measures the quality of housing.
  - 2. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index**: The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index**: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

There are 16 LSOAs that are either fully or partially in the Neighbourhood Plan area. Two of the LSOAs, E01023018 New Forest 020B and E01023055 New Forest 020D are in the top30% most deprived deciles for more than half of the factors examined.

Eight of the LSOAs are in the top 30% most deprived deciles for the Geographical Barriers subdomain, with only two of the LSOAs performing well in this category.

Six of the 16 LSOAs within the NMNP area were in the top 30% least deprived deciles for more than 80% of the factors examined, with E01022987 New Forest 022D and E01023020 New Forest 018C scored in the top 30% least deprived for all factors except for the Geographical Barriers Sub-domain.

The LSOAs toward the far south of the NMNP area generally have low levels of deprivation as do E01022984 New Forest 018A LSOA which covers the majority of the north of the NMNP area.

The most deprived areas tend to be in the centre of the NMNP area, in particular surrounding New Milton town centre. In this context E0102301New Forest 020B in particular has high levels of deprivation.

# Housing Tenure

The majority of residents in New Milton (76.1%) own their home outright or with a mortgage, broadly aligning with the average for the New Forest District, but 8.5% higher than the regional average and 12.8% higher than the national average. The percentage of residents living in socially rented houses is approximately 2.9% and 6.9% lower than the averages for the South East and England

respectively. Furthermore, fewer people live in privately rented households in the parish than the New Forest District and regional and national averages.

Across the New Forest District Council area there are around 3 000 people on the social housing waiting list.

# Education

With regards to the most recently available census data, 26.7% of residents within the NMNP area have no qualifications, a percentage which is significantly higher than the averages for New Forest District and the South East. The opposite trend is observed for those residents with level 4 qualifications, with at least 5% fewer residents having a level 4 qualification than the regional and national counterparts. Whilst there are significant contrasts between the highest and lowest qualification levels, the percentage or residents in New Milton who have a level 1, 2, or 3 qualification broadly aligns with the regional and national averages.

The current standard of schools is either 'good' or 'outstanding' (Ofsted), with a good variety of schools. The higher percentage of residents with no qualifications is likely to reflect the higher proportion of older residents who left school at a younger age and to some extent to qualified young people moving away A key issue for economic vitality is therefore the retention and attraction of younger people in the Neighbourhood Plan area who tend to be more highly qualified.

The NFDC Local Plan Review SA Scoping Report 2015 describes the current education baseline. There are indications of unmet demand for early years' education within New Milton with a lack of suitable sites and premises. A lack of early years' childcare has knock-on effects for the economy, preventing parents continuing in further education or employment.

Hampshire County Council's School Place Planning Framework 2013-2018 provides forecasts for the capacity of schools in the area based on changes in the number and size of households. In general, there is high demand for places within primary schools as recent high birth rates feed through to the school population. Pupil numbers in secondary education have generally been falling, but spare capacity in this sector will be taken up as the increases in the primary sector feed through. Table 7.5 sets out the capacity forecasts at 2018 for the various parts of the District.

# Employment

There is a significantly higher proportion of residents (aged 16 to 74) in New Milton who are employed in caring, leisure and other services compared to regional and national averages. The same trend is observed for those employed in skilled trade occupations. Two occupation categories employ fewer residents within the NMNP area compared to the averages for the New Forest District, the South East, and England, including associate professional and technical occupations and professional occupations. The fewer people employed within these highly skilled occupational categories might be a reflection of the educational trends previously discussed.

# **Summary of Future Baseline**

# Population and Age Structure

The 2014 ONS subnational population predictions show how the number of people in the different age groups is predicted to change over the next 20 years in New Forest District. While the number in the age groups 0-65 stay the same the number of people in the 65+ age group increases by 43%. This increase in over 65's is thought to be largely due to local people, already in older age groups, continuing to age rather than this older age group moving in. Deaths will exceed births over this time and the additional new people are predicted to arrive due to in-migration of those under 65- perhaps not much under 65 as people continue to retire here.

The existing 930 allocation provided by the Local Plan is likely to, without appropriate policies within the Neighbourhood Plan, simply support this increasingly ageing population.. Extrapolating data in the New Forest Local Plan forecasts that, under a do nothing scenario, New Milton is predicted to change from a third of people being over 65 to potentially half by 2036. 37% increasing by 43%-

53%<sup>48</sup> To alter this current demographic prediction will mean building significantly more homes and taking significant steps to ensure most new homes are designed and priced for young people and families.

# Housing needs

There will be a real possibility that the need for affordable housing for younger people will not be met by current NFDC proposal for 930 houses in New Milton; the need for almost all the homes proposed by NFDC to be affordable conflicts with the requirement to meet financial viability targets. Significantly more than the 930 houses proposed are likely to be required if enough affordable homes are to be built.

Regardless whether more affordable homes for younger people are built, the number of New Milton people in the over 65 age group is set to grow by 43% or around 4 000 people (43% of 9 990; 37% 27 000 = 9990) and this will have implications for the type of future housing and care provision. There is likely to be increased demand for elderly residential care and nursing care in New Forest District. With New Milton already providing 40% of the Districts care homes places it is arguable that the parish is at capacity and increased provision should be provided elsewhere in the District.

Pensioner households tend to under-occupy their housing with a high proportion (54%) of pensioner households having at least two more bedrooms than are required to accommodate the household. This would suggest that provision of smaller dwellings suitable for accommodating older people would facilitate the process of downsizing and freeing up larger family-sized accommodation.

# Employment and Economy

The trend of fewer younger people and families will also impact on the number of people of working age living in the Neighbourhood Plan area. With the number in the local community over 65 predicted to rise by 2036 care agencies are likely to experience real difficulties recruiting staff to meet the local care need. Similarly the rather restricted and low paid range of local employment will continue or worsen if new, higher paid businesses are not attracted into the area.. As such the demand for local professions such as builders, electricians, plumbers etc. will not be met. Furthermore, with an ageing population, there will be a lack of an employment pool of younger workers to attract business investment.

New Milton residents noted the need for a greater range of better paid jobs in the 2016 Community Survey (New Milton Neighbourhood Plan: The October Survey 2016 Executive Summary Neighbourhood Plan Working Group) Increasing the number of younger people and families will be important in keeping existing businesses and attracting new businesses.

In early 2014 the District Council and the National Park Authority together undertook a survey of the needs of businesses in the District. In response to questions regarding the need for new premises, more than 40% of respondents expected their space requirements to change over the next five years with more than three-quarters of these expecting to need more space. About one third of those requiring more space felt they could expand on their existing site. When asked about what characteristics were being sought in new premises the most popular requests were sites with superfast broadband (33%), rural business units (28%) and easy-in/easy-out accommodation (26%).

The future of the Town Centre is likely to change and the trend for vacant premises and charity shops is likely to continue without significant investment. The rise of online retailing is likely to be affecting the viability of traditional high street shops, although this is difficult to quantify. One of the strongest messages given in the October Survey was for a more thriving town centre with a better range and quality of shops and better evening leisure opportunities- and no more charity shops.

In the future, town centre activity everywhere may need to become more leisure-oriented, with people choosing to meet, eat and drink, as well as shop- New Milton town centre will need to adapt to survive. Attracting younger people and families is likely to be important to the success of attracting the necessary town centre investment.

<sup>&</sup>lt;sup>48</sup> NFDC Local Plan Review 2016-2036. Part 1 Planning Consultation.

# Health and Wellbeing

# **Context Review**

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>49</sup> ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Joint Strategic Needs Assessment (JSNA)<sup>50</sup> for the New Forest District identifies key issues for the new forest, these include, life expectancy and healthy life expectancy gap, lifestyle risks, health and social inequalities, demographic growth, long term conditions and working age.

The JSNA states that there are a wide number of factors that influence and determine good health, and the basis of this is 'starting well', 'staying well' followed by 'ageing well'. This covers the health and life chances of the children within the New Forest District Council, the health of the adult population and the health of the older population.

<sup>&</sup>lt;sup>49</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <<u>http://www.apho.org.uk/resource/item.aspx?RID=106106</u>> last accessed [27/01/17]

<sup>&</sup>lt;sup>50</sup>Hampshire County Council (2015) New Forest District Joint Strategic Needs Assessment [online] available to download from: <<u>http://www3.hants.gov.uk/healthandwellbeing/public-health/jsna.htm</u>> last accessed [20/04/17]

# **Summary of Current Baseline**

#### Health Indicators and Deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 7. General health is varied in the Neighbourhood Plan area, with 75.9% of residents reporting either 'very good health' or 'good health' in the most recent census. This percentage is lower than the averages for New Forest District (81%), the South East (83.6%) and England (81.4%). Comparatively 6.5% of residents in the NMNP area report either 'bad health' or 'very bad health', which is 1.6% higher than the New Forest District, 2.1% higher than the South East and 1.3% higher than the average for England.

The higher than average levels of 'bad health' and very bad health' contrast with the disability data, with New Milton less limited by disabilities when compared averages for the district, the South East and England.

# Summary of Future Baseline

Broadly speaking, levels of health and well-being within the NMNP area varies, with fewer residents having 'very good' health when compared with other local, regional and national data. This is influenced by a significant proportion of the population being within older age groups.

An ageing population has the potential to increase pressures on community and healthcare services and is therefore a significant influence on the future health and well-being within the NMNP area.

As the population ages, there will be an increasing need for those working in the caring professions. Care agencies and residential care homes currently struggle to recruit enough staff, and this will become more difficult as the community continues to age.

# **Transportation**

# **Context Review**

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008.

The Hampshire Local Transport Plan<sup>51</sup> was first adopted in 2011, and is split into two sections, Part A – the long term strategy 2011-2031 and Part B – the three year implementation plan 2014-2017. The Plan was written with the aim of developing and supporting stronger safer communities, maximising well-being and enhancing quality of place and to help realise the vision; "*safe, efficient and reliable ways to get around a prospering and sustainable Hampshire*".

It also states "To meet these duties and expectations, the County Council needs to work closely in partnership with a wide range of stakeholders including District Councils, infrastructure providers, Government agencies, public transport operators and providers of community transport services to plan and jointly fund transport improvements. These will include schemes that improve integration between different travel modes."

Within the New Forest Core Strategy, policies CS23 and CS24 are related to transportation, with Core Strategy Objective 5 seeking:

<sup>&</sup>lt;sup>51</sup>Hampshire County Council (2011) The Hampshire Local Transport Plan [available online]

<sup>&</sup>lt;<u>https://www.hants.gov.uk/transport/strategies/transportstrategies</u>> last accessed 20/04/17.

"To improve accessibility to services, employment, social and leisure opportunities in a safe convenient way, thus minimising the need to travel, particularly by private car, to manage congestion on key traffic routes."

*Policy CS23 Transport Proposals* seeks to support improvements to reduce congestion and increase access and road safety, providing the proposals can be achieved without an unacceptable impact on the local environment and communities. The policy also seeks improvements to public transport, through supporting infrastructure to increase scope for public transport services and supporting improvements to public transport interchanges and rail improvements.

*Policy CS24 Transport Considerations* seeks to promote improvements in the quality and sustainability of transport infrastructure through a range of methods, particularly through reducing the impact of new development on the existing transport infrastructure. Where appropriate, development proposals will be required to:

- include a range of appropriate mitigating transport measures, particularly aimed at improving accessibility by non-car modes and reducing the adverse impact of traffic;
- ensure that adequate lorry access routes are available and suitable;
- ensure necessary transport improvements are addressed prior to development;
- produce and implement Transport Assessments and Site Travel Plans, as appropriate.

#### **Summary of Current Baseline**

#### Rail Network

New Milton railway station is located in the centre of the NMNP area. The station is on the London Waterloo, Southampton, Poole and Weymouth line, with twice hourly services in each direction.

#### Road Network and Congestion

The A337 provides access between New Milton and neighbouring towns, providing the main route to Lymington to the east and Christchurch to the west. The B3058 Milford Road runs from the north of the NMNP area to the south, running through New Milton town centre.

The town centre experiences significant congestion issues, particularly at peak summer periods. Increased commuter traffic through Bashley is a great concern to the village, as well as problems with speeding.

Consultation has highlighted that a limitation of traffic congestion and adequate parking are important to the quality of life of local residents.

#### **Bus Network**

There are various bus stops located throughout the Neighbourhood Plan area. The Wilts and Dorset bus service runs through New Milton, connecting with Lymington, Bournemouth and Poole. The New Forest bus tour runs during the summer and allows for passengers to take their bikes, which allows access to the New Forest without the use of private cars. In this context the blue route stops in New Milton and Barton-on-Sea<sup>52</sup>.

<sup>&</sup>lt;sup>52</sup>New Milton Town Council Website – Local Transport Information available online at

<sup>&</sup>lt;http://www.newmiltontowncouncil.gov.uk/local-information/transport/> last accessed [16/04/17]

# Cycle and Footpath Network

Given the built up nature of much of the NMNP area, there is a lack of off-road footpaths in the NMNP area. However there is a route connecting Barton-on-Sea to Downton, outside of the NMNP area and to Ashley, as well as a route along the seafront connecting to Highcliffe. There is a perception that there is a lack of a comprehensive and co-ordinated walking and cycling network in New Milton.

The main area for walks recommended on Walking in Hampshire<sup>53</sup> is the area to the south-east of the NMNP area around Barton Common and the golf course, with three circular walks available at differing lengths and suggested starting points. These footpaths link to coastal walks towards Barton-on-Sea.

# Availability of Cars and Vans

In regards to access to vehicles within the NMNP area, the proportion of households with no access to a car or van in New Milton (17.2%) is higher than New Forest District (13.3%), but lower than the South East (18.6%) and national average (25.8%).

# Travel to Work

The most frequently used method of travel to work is via driving a car or van (41.1%) which is similar to the average for the South East (41.3%) but is 4.2% higher than the national average (36.9%) and 5.1% lower than the New Forest District average. After driving, the second most popular method of travelling to work in New Milton is on foot (5.9%), which is similar to the New Forest District average (5.4%) but lower than the regional average (7.4%) and the national average (6.9%),

# **Summary of Future Baseline**

New development and visitor traffic has the potential to increase traffic along the key routes through New Milton, particularly the A337 and the B3058 Milford Road. This is likely to increase existing congestion issues in the town centre. Increased congestion through Bashley village and on routes to the A35 also have the potential to arise.

Public transport usage has the potential to remain relatively low compared to private car use in the area, although there is potential to increase sustainable transport use and active travel such as cycling. There is potential for the number of people working from home in New Milton to significantly increase due to modern working patterns such as agile and flexible working.

Whilst negative effects of new development on the transport network are likely to be in part mitigated by the provisions of the Hampshire Local Transport Plan and other initiatives, overall increases in car use may arise as a result of growth in the parish.

<sup>&</sup>lt;sup>53</sup> Walking In England (2011) Walking in Hampshire – New Milton Walks [online] available via <<u>http://www.walkinginhants.co.uk/new\_milton.php</u>> last accessed [16/04/17]

AECOM Infrastructure & Environment UK Limited 3rd Floor, Portwall Place Portwall Lane Bristol BS1 6NA United Kingdom

T: +44 117 901 7000 aecom.com