



TERENCE  
O'ROURKE

Suna King  
New Milton Town Development Manager  
New Milton Town Council  
Town Hall  
2 Ashley Road  
New Milton  
BH25 6AS

26 February 2018

Our Reference: 248905

Dear Suna,

**New Milton Neighbourhood Plan  
NM3 - Land East of Brockhills Lane**

I refer to your e-mail of the 16 February, our subsequent telephone conversation and Mark Williams e-mail of 19 February. I have discussed Mark Williams' comments at some length with our client, which were made in light of our previous letter to you (24 January). We are confident that sufficient SANG and public open space can be provided for 160 units for the following reasons.

We continue to be of the view that it is premature to determine the housing mix for this or any other site at this stage in the process. However, in light of Mark's comments we have reviewed the proposals for the Brockhills Lane site with specific reference to existing evidence on housing mix (SHMA 2014) and recreational mitigation (Mitigation Strategy for European Sites, 2014). It is appropriate that current policy is applied at this time which has been scrutinised and tested through the appropriate process, as required by the NPPF, together with the latest published evidence, Notwithstanding this, we note that the emerging requirement for the quantum of SANG to be provided is broadly similar to that set out in existing policy.

Accordingly we have reassessed the proposals for Brockhills Lane applying the housing mix set out in the SHMA and using current occupancy figures set out in the Mitigation Strategy for European Sites, 2014 SPD. We note that the occupancy figures provided in SPD are derived from the HCC Home Movers Survey, to which Mark Williams refers in his e-mail. We acknowledge that this results in a requirement for a small amount of additional SANG to be provided. Accordingly, we have adjusted the proposals to meet this requirement, as shown on the enclosed plan. The proposal continues to provide development at a density of around 30dph, which is appropriate for this location.

Having reviewed the information that Mark Williams' provided in his e-mail of 19 February there appears to be no substantive basis for the scenarios set out.

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Furthermore, the scenarios identified do not accord with the housing mix that Pennyfarthing has provided on its recent sites in New Forest District.

We note that paragraph two of Mark Williams' e-mail acknowledges that detailed consideration of recreational mitigation can be dealt with at the detailed design stage and he is clear that if this demonstrates that more homes than originally envisaged can be provided satisfactorily, then this will be acceptable. Hence, we note that the district council intends to provide flexibility in applying its policies in respect of site capacity. This further recognises that at the time of preparing a planning application it may be possible to demonstrate that a site can accommodate more than originally allocated whilst meeting the requirements of policies that can be attributed weight at that time.

We are confident that with the revisions set out above and shown on the enclosed plan, sufficient SANG and public open space can be provided for 160 units,

Whilst it is not for us to advise on the wording of policy, this being the role of the neighbourhood plan working group and your consultants, in light of Mark Williams' comments we consider that sufficient flexibility should be provided for within the neighbourhood plan policy to enable proposed allocations to accommodate additional dwellings if this can be satisfactorily demonstrated. We suggest that policies should require the provision of "at least" the identified number.

If you wish to discuss the above please do not hesitate to contact me.

Yours sincerely,



Technical Director

cc



Pennyfarthing Homes  
New Forest District Council