

Ms S King
New Milton Neighbourhood Plan
The Town Hall
2 Ashley Road,
New Milton
BH25 6AS



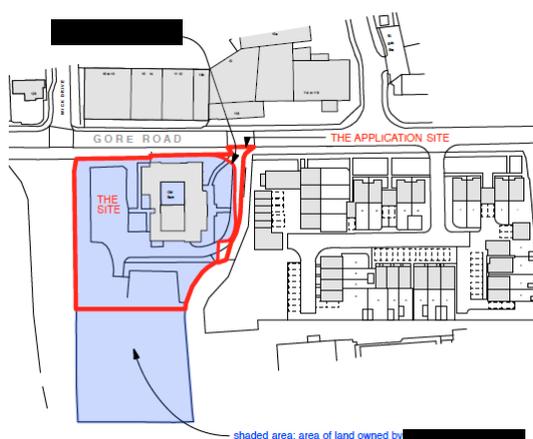
Sent by email to Suna.King@newmiltontowncouncil.gov.uk

24th May 2018

Dear Ms King

Representation to the New Milton Neighbourhood Plan Pre-Submission (April 2018)

I have received an instruction from my client to submit representation regarding his site of interest, in light of the publication of the New Milton Neighbourhood Plan (NP) Pre-Submission (April 2018). I am aware that your consultation period has recently closed, however this correspondence represents a material planning consideration and therefore should be accepted. My client was not fully aware of the deadline for representations, so simply wants to put his opinion across and for those comments to be considered in the next stage of the NP. Since the closure of the consultation event happened only recently, this late representation should not delay the next phase of the NP process.



The site that my client has of interest is located to the south of Gore Road which is within the designated boundary of the NP. The site is to the west and south of Milton Barns, currently used partially for car parking and amenity. The site is located within the Green Belt. The client's preference would be the delivery of a housing scheme, that could accommodate a high proportion of affordable housing with some additional market housing, to make the scheme deliverable and viable.

Paragraph 1.11 of the NP clearly advises that *“Neighbourhood Plans are not able to modify Green Belt boundaries to release land for development. This remains the responsibility of local planning authorities in reviewing their Local Plans. However, it is possible for Local Plans and Neighbourhood Plans to come forward in tandem, using the same evidence base, to enable the former to release land from the Green Belt making the strategic case, and the latter to set out the allocation policy making the local case”*.

In the vision section of the NP, it is clear that your Council’s aspiration is to provide affordable homes for youngsters and 2-3 bedroom family homes. The allocation of the client’s site for affordable and market housing would assist to meet that growing need.

In paragraph 5.5 the NP acknowledges that *“With the town being surrounded by the South Hampshire Green Belt, it can only grow by using land that makes the least contribution to the purposes of the Green Belt”*. Having regard to the purposes of Green Belt set out in the National Planning Policy Framework, the designation of Green Belt on this land is failing to meet those purposes, as follows:

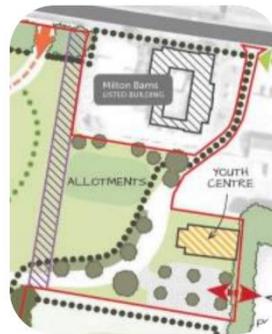
Green Belt Policy Purpose	Actual Impact of this Site to Meet That Test
to check the unrestricted sprawl of large built-up areas;	The site is not located adjacent to large built-up areas, those being either Christchurch or Milford On Sea.
to prevent neighbouring towns merging into one another;	Any development on this site will have no impact on preventing towns from merging.
to assist in safeguarding the countryside from encroachment;	The site is adjacent to existing buildings and other recently constructed and approved developments.
to preserve the setting and special character of historic towns; and	The development of this site will have no impact on preserving the setting and special character of nearby towns.
to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	The development of this site will have little impact on the delivery of regeneration of derelict or other urban land.

As such, in my opinion the actual designation of Green Belt covering this piece of land is failing to meet any of the purposes and de-designating it, will enable the delivery of affordable and market housing. Paragraph 89 of the National Planning Policy Framework states *“A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are (amongst others):*

- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan;”*

You acknowledge in paragraph 6.6 that New Milton is the second largest settlement in the District, and its location is wholly sustainable so can “accommodate proposals for major development, either on brownfield land within the settlement (especially the Town Centre) or on land at its edges to be released from the Green Belt.”

Policy NM4 of the NP addresses the land to the south of Gore Road. The draft policy refers to the release of Green Belt “for a residential mixed-use development comprising residential, commercial and community uses and green infrastructure” subject to sub-section policy caveats. This policy supported scheme represents a significant extension to the urban area, which my client’s site will be partially part of according to your concept plan. In the concept plan, your policy splits my client’s site in two, namely part of the site is excluded and the other, to be used as allotments. In our opinion, this is a missed opportunity as my client is willing to deliver affordable and market housing. The plan suggests a youth centre to the east of the larger site, but this would be isolated and lack connectivity or surveillance to the wider residential area.



Extract from Plan C of the NP.



Suggested modification of Plan C of the NP.

If my client’s scheme was incorporated into the larger development site, there would be that connectivity and delivery of a comprehensive redevelopment of the area to deliver homes, rather than leaving a vacant area of land. Please could you extend Policy NM4 to include my client’s site, so affordable and market housing can be delivered?

For the avoidance of doubt, my client’s site does not include Milton Barns. The structure will be retained, and the setting could be enhanced. I would however take this moment to advise that the detailing on Plan C (above) is incorrect. You have indicated that Milton Barns is a Listed Building, however having reviewed Historic England’s schedule of Listed Buildings in this area, the Barns are not listed.

I trust you will take these comments into account when redrafting the NP towards the next stage.

Yours sincerely



Senior Planning Consultant – Pure Town Planning