

New Milton Neighbourhood Plan – Pre Submission Consultation:  
NFNPA Representations – 15 May 2018

Page	Paragraph	NPA Representation – May 2018
9	1.2	Paragraph 1.2 states that the Neighbourhood Plan will cover the same period as the forthcoming NFDC Local Plan (2016 – 2036). For completeness, reference should also be made to the NPA's Local Plan Review which also covers the period 2016 – 2016 and will form a key part of the statutory development plan for the northern part of the parish.
11	1.12	The paragraph currently states that “... <i>the Town and District Councils have worked closely together to make a series of site-specific proposals.</i> ” This should be amended to “... <i>the Town and District Council have worked closely together...</i> ”
12	1.15	Reference is correctly included to the proximity of the New Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). Reference should also be made to the protected sites of the Solent and Southampton Water, as parts of the designated Neighbourhood Area lie within the 5.6 kilometre buffer within which financial contributions towards mitigation measures for the Solent sites are required.
12	1.16	Paragraph 1.16 states that the Neighbourhood Plan will be, “... <i>submitted to the District Council.</i> ” As the Neighbourhood Area covers land within two separate local planning authorities (NFDC and the NPA), the Neighbourhood Plan will need to be submitted to both planning authorities – although obviously we will arrange a single examination and referendum.
21	3.1	Paragraph 3.1 states that, “ <i>New Milton lies within the New Forest District Council (NFDC) planning authority area.</i> ” As outlined above, the designated Neighbourhood Area includes land within two separate planning authority areas – the District Council and the National Park – and this should be reflected in paragraph 3.1.
21	3.2	The bullet points in paragraph 3.2 list the paragraphs of the NPPF that are particularly relevant to the Neighbourhood Plan. This should include reference to paragraphs 115 and 116 of the NPPF (2012) which set out the Government's policy position on National Parks, including the major development test.
35	Policy NM3	The proposed housing site allocation at Brockhills Lane lies adjacent to an area of Ancient Woodland and a designated SINC. It will be important that the development ensures the protection of these designated sites. The National Park Authority has some concerns regarding the scale of development proposed and its immediate proximity to the

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		National Park. Criteria b (ii) which requires a landscape buffer to the National Park will be an essential part of the development to reduce these landscape impacts.
62	6.60	Paragraph 6.60 states that the proportion of affordable housing sought on brownfield sites will be lower due to the higher development costs. The Authority queries whether this conclusion is informed by a viability assessment, or whether the affordable housing targets set out in the draft Neighbourhood Plan are based on the viability work commissioned by the District Council from Three Dragons?
65	Policy NM7E	<p>The draft policy focuses on mitigating the impacts of development on the New Forest Special Protection Area and refers to, “...<i>off-site financial contributions.</i>” While it is recognised that this will be the main route for mitigating the impacts of smaller developments, there may be developments where on-site provision could be sought and the policy wording should not preclude this.</p> <p>Secondly, as outlined above there is no reference to mitigating the impacts of development on the designated Solent sites. The 5.6 kilometre buffer around the Solent sites extends into the New Milton Neighbourhood Area and this should be referenced within the Plan.</p>
76	6.89	The National Park Authority is content with the wording of policy NM12. Paragraph 6.89 goes onto state that although Bashley itself only has limited local services, it lies close to New Milton and therefore it is, “... <i>considered to meet the test of that policy and such proposals would be supported.</i> ” The Authority has some concerns that this wording suggests any potential rural exception site in the Bashley area would meet the criteria of Policy CP11 in the Authority’s adopted Core Strategy. Obviously there are other policy tests to be met alongside proximity to services and paragraph 6.89 should be reworded to clarify this.