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15 May 2018

Our Reference: 255701

By e-mail

Dear Suna

**New Milton Neighbourhood Plan Pre-submission Plan consultation  
response on behalf of Bradbeers**

Thank you for consulting Bradbeers on the pre-submission draft of the new Milton Neighbourhood Plan. We are pleased to submit this representation on behalf of Bradbeers, setting out their broad support for the emerging neighbourhood plan.

Bradbeers welcomes the identification of two areas of the town centre at the southern end of Station Road for redevelopment, parts of which are in Bradbeers' ownership. We have provided below detailed comments on some aspects of the draft plan, which are made in the context of the 'basic conditions' tests.

**Introduction & background**

Bradbeers welcomes New Milton Town Council's aspirations to change the demographic profile of the town to achieve a more balanced age profile.

Notwithstanding this, there will continue to be a need for housing for existing and new older residents, many of whom are increasingly active into their older years. Older people can make an important contribution both economically and socially to the wider community, with potential for higher levels of disposable income. We consider that recognition of this should be included in the Vision.

The provision of appropriate accommodation for the elderly can assist in 'freeing up' existing family housing, and we consider that recognition of the importance of planning for the elderly can assist in achieving the aspirations of changing the demographic profile of the town.

Bradbeers is pleased that the plan will be subject to a screening assessment under the Habitats Regulations and is keen to ensure that appropriate work is

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undertaken in relation to such matters to ensure that the plan meets the basic conditions and is legally sound.

### **Planning policy context**

Paragraph 3.4 sets out those documents that comprise the development plan in New Forest District. Paragraph 3.6 then refers to the Local Plan Part 2: Sites and Development Management. It should be recognised that the Sites and Development Management plan also forms part of the development plan and should be referenced in paragraph 3.4.

The September 2017 Planning Development Control Committee with the Environment Overview and Scrutiny Panel committee papers provided an indication of the direction of travel for the emerging Local Plan and its content at that time. However, we do not consider that it can be assumed that this still represents the District's intended approach given that it has not formally published the next stage of the local plan review for consultation and continues to hold discussions with all site promoters. It will, therefore, be necessary to review and update paragraph 3.8 of the draft neighbourhood plan once the next stage of New Forest District's Local Plan is published and consultation is undertaken, which is currently due to take place in June 2018.

We consider that it would be appropriate and desirable for the neighbourhood plan to acknowledge the scale of development to be accommodated within New Milton, as set out in the local plan, and any additional development to be provided through the neighbourhood plan.

You will be aware that, to date, the District Council is not proposing to meet its identified housing need in full or to respond positively to all opportunities for sustainable growth. At its September Scrutiny meeting, a housing target of approximately 9,900 homes over 20 years (equivalent to 495 homes per annum) was discussed. This compares poorly to the Objectively Assessed Need (OAN) of 12,740 homes (equivalent to 637 homes per annum) and/or the DCLG standard methodology OAN of 965 homes per annum. It even fails to meet New Forest District Council's (NFDC) previous assessment of the OAN, of 521 homes per annum as set out in the October 2017 report.

We continue to believe that an increased housing target in the neighbourhood plan, beyond that in the emerging local plan, will provide resilience and is supported. Bradbeers welcomes and supports the ambition of the neighbourhood plan to provide additional housing, which will help to address urgent local need and contribute to ensuring the future sustainability of New Milton. This would ensure that the plan meets the housing requirements of the NPPF and thus meet the requirement of the basic conditions to have regard to national policies and guidance.

### **Community views on planning issues**

Bradbeers welcomes the support that the local community has provided to date for the provision of a more vibrant town centre, which would include new housing and the provision of additional job opportunities. It also welcomes the support for the regeneration of the town centre, and Bradbeers is keen to play its part in achieving this.



## Vision and objectives

Bradbeers supports the draft Vision for 2036, particularly in respect of the provision of a wider range of shops and services which will substantially improve the town centre and provide greater levels of employment. Bradbeers particularly welcomes the support that the vision provides for the retention of key local employers. As one of the larger employers in New Milton, Bradbeers is keen to build on this to provide improved retail facilities that will contribute to the enhancement of the town centre and increase employment opportunities.

Bradbeers is supportive of the recognition that the retail offer of the town forms part of the key requirements to attract and retain younger households. It welcomes the acknowledgement in the objectives that the Town Centre is a vital housing location. We believe that it would be beneficial to acknowledge in the supporting text that achieving the vision will also involve more people living in mixed-use developments in the town centre.

We consider it equally important, however, that the vision acknowledges that providing appropriate, suitable accommodation for older people in the town (particularly in a town centre location) can free up family housing elsewhere in the town, and provide support to the local shops and services, which together are key in enabling the vision to be achieved.

The neighbourhood plan should therefore acknowledge that there will be a need to continue to house the older generation, particularly given that government projections are for the population of New Forest to continue to age, with a higher number of elderly residents within the District. This is echoed in the District Council's draft Housing Strategy 2018-2023.

## Policy NM1 A spatial plan for New Milton

Bradbeers is generally supportive of Policy NM1 but considers that what constitutes 'major development' for the purposes of the neighbourhood plan should be defined.

## Policy NM2 Diversifying Housing

Bradbeers appreciates and understands the Town Council's desire to encourage younger people into the town through the provision of Starter Homes and private rented homes. However, Bradbeers are concerned that the policy requirement for 20% of open market homes to be starter homes or private rented homes could jeopardise investment which will assist in meeting the overall vision of the neighbourhood plan, and may not meet the basic conditions.

To ensure the policy meets the basic conditions the policy needs to be justified by way of credible evidence showing that the requirements of the policy would contribute to the achievement of sustainable development and will be viable, as required by the NPPF, to ensure that the policy is consistent with national policy.

It is not clear whether the impact of the policy on the viability of development proposals has been assessed (there is no viability information on the Town Council's evidence base) and Bradbeers considers it likely that there will be an adverse impact, which it considers unacceptable and contrary to Government



policy and guidance. The policy may also not result in meeting the housing need, in light of the growing ageing population. Therefore, this does not meet the basic conditions.

In terms of effectiveness, whilst Starter Homes are specifically restricted to younger people (although only when first purchased), private rented housing has no restrictions on occupancy and as such may be occupied by older as well as younger people, and Bradbeers is concerned that it will not therefore achieve the aims set out.

Whilst neither Starter Homes or private rented homes are currently considered to be affordable housing under the National Planning Policy Framework (NPPF), the current consultation on revisions to the NPPF proposes to include Starter Homes within the definition of affordable housing and as such this would result in up to 60% of homes being brought forward on sites in New Milton town centre (the opportunity area) required to be affordable (based on the existing local plan affordable housing policy). In order to be consistent with national policy and thus meet the basic conditions, the definition of affordable housing in the neighbourhood plan must be consistent with the NPPF. It is very likely that revisions to the NPPF will be in place before the neighbourhood plan is submitted for examination. It is not clear whether the impact of this on the viability of development proposals and the neighbourhood plan has been assessed (there is no viability information on the Town Council's evidence base) and Bradbeers considers it likely that there will be an adverse impact, which it considers unacceptable and contrary to Government policy and guidance.

In addition, Bradbeers has some concerns regarding the practical delivery of private rented homes.

As the draft policy has not been subject to an assessment of its impact on viability, we are concerned that the policy requirement will potentially jeopardise the fulfilling of the wider neighbourhood plan vision by stalling developments, as schemes may no longer be viable. For example, in terms of town centre brownfield redevelopment, capital receipts from the sale of homes at full market prices may be needed to ensure that additional high quality retail development can be delivered.

Overall Bradbeers has seen little evidence or justification to support this policy and paragraph 6.12 acknowledges that it is not clear whether the desired change in the demographic will be sufficient to change investment patterns in commercial and public services.

We therefore suggest this policy is deleted, or includes a clause that the provision of affordable housing is 'subject to viability', so that it is consistent with national policy, and does not jeopardise delivery of the wider vision.

### **Policy NM7 The New Milton Town Centre**

Bradbeers welcomes the identification of New Milton Town Centre area as supporting a range of redevelopment opportunities to deliver residential, retail, cultural and health uses. In particular, Bradbeers supports the identification of



Site D Station Road/Spencer Road and Site E Station Road/Elm Avenue for redevelopment.

However, we wish to raise concern that the policy states that proposals for any site that is not allocated in the neighbourhood plan, but is within the opportunity area, will be supported simply provided it demonstrates how it will 'contribute to the viability and vitality of the town centre in terms of its primary retail, commercial, social, and cultural role'. This contrasts with the requirement that the allocated sites are required to comply not only with development principles identified for each site but also with other relevant development plan policies. We suggest for consistency it should be clear that proposals for development elsewhere in the opportunity area also should also be consistent with other development plan policies in order to be supported.

Bradbeers welcomes the recognition through the district council's 2010 retail study and the more recent update undertaken by the town council that there is considerable opportunity to enhance the town centre, including the provision of comparison retailing. Bradbeers considers that it is well placed to assist with this.

Paragraph 6.34 also recognises an opportunity for independent stores to assist in creating a place that people want to visit, but it should also be recognised that chain stores can also have a role in attracting footfall and supporting the wider high street.

Paragraph 6.35 summarises the key recommendations of the Town Council's Town Centre Retail Study. Bradbeers welcomes the recognition that the southern end of Station Road provides an opportunity for mixed use development or redevelopment. The provision of enhanced public spaces is also welcomed. Clarity would be welcomed on what is meant by smart parking. Bradbeers supports the enhancement of the food and drink offer in the town centre, which will assist in encouraging local residents and visitors alike to visit the town centre.

Bradbeers supports the long-term vision for the town centre, however it should include a greater reference to more people living in the town centre to accord with the objective of the neighbourhood plan which states that the town centre is a "vital housing location".

The acknowledgement that the town council will work with partners, developers and landowners in paragraph 6.39 is welcomed, and Bradbeers is keen to work with the town council to achieve regeneration in the town centre to assist with delivering the vision.

Comments are set out below for the two proposed allocations that Bradbeers has an interest in. For these allocations, for the avoidance of doubt, it is suggested that these include 'policy' within the heading to make clear these are policies.



## Site D: Station Road/Spencer Road

Bradbeers is concerned that the plan included on page 55 is incorrect and should incorporate the wider area forming the corner of Station Road and Spencer Road. It is also unclear what the dotted black arrow lines indicate and these should be removed. Bradbeers considers that the town centre plan at the back of the neighbourhood plan more accurately reflects the area that should be included in Site D. The plan accompanying the policy for Site D should therefore be replaced. A plan was previously provided to the town council for inclusion in the neighbourhood plan and is appended to this representation. Bradbeers considers that it is this area that should form the basis of Site D.

Bradbeers consider the policy for Site D to be overly prescriptive in specifying the form of development that will be acceptable. In particular, it has significant concerns regarding the reference to residential development being only on the upper two floors. The policy for Site E does not make reference to particular floors or heights, and we consider that this should be the case on this and other sites to ensure flexibility in considering the detailed design of the proposals, and to maximise the development potential of brownfield sites in the town centre. There is no evidence to support the contention that a building of up to four storeys is the most appropriate. The acceptability and appropriateness of the form of development should be demonstrated and considered through the submission of a planning application, which provides an appropriate level of evidence for the scale of development. Bradbeers are not aware of any evidence that suggests that a four-storey building is the only appropriate response to the redevelopment of this site and thus this element of the draft policy fails to meet the basic conditions requirements in respect of the need to comply with national policy and guidance or the achievement of sustainable development. Bradbeers requires that the reference “on two upper floors” is deleted from the draft policy.

Furthermore, the policy text on the redevelopment of the car park and servicing land to the rear should also support the provision of other uses, such as residential, hotel, care home or other appropriate uses, which can support the town centre. These other uses could wrap any multi-storey car parking to provide an attractive outlook on Spencer Road, and enhance the viability of providing replacement car parking. It will also ensure compliancy with the third element of the policy ensuring an enhanced frontage onto Spencer Road. The second paragraph of the policy Site D should be amended to include reference to “together with other uses such as residential development, care home, hotel or other appropriate uses, ...”.

The wording of paragraph 6.45 should be clarified to ensure that it is clear that the residential development referenced is located above the parade of shops at the southern end of Station Road and not above the former Co-op. Bradbeers welcomes the recognition that the redevelopment of the area between Station Road and Spencer Road has the potential to provide both enhanced retail space and also residential development. It is supportive of the roles that redevelopment of this area can provide, as set out in paragraph 6.46.

## Site E: Station Road/Elm Avenue



Bradbeers supports this policy, which relates to Bradbeers existing department store. Bradbeers, whilst supportive of the re-provision of retail use on the ground floor, consider that at ground floor an alternative use such as café or restaurant/pub could be equally suitable and enhance the town centre, and assist with achieving the neighbourhood plan vision. Therefore, it is suggested the policy is amended to require a ground floor use which has an active frontage and would be complementary to the retail function of the town, and would enhance the overall vitality of the town centre. This accords with Policy CS20 of the New Forest District Core Strategy.

The policy text should be amended to state that the site 'does' (instead of 'may') provide the opportunity for a building which makes a positive contribution to the town. The supporting text should also acknowledge the site as suitable for a taller building, subject to detailed design and consideration of the impact of such a building on the surrounding area.

### **Policy NM7B: Housing Types and Tenures in the Opportunity Area**

Whilst Bradbeers support the principle of the provision of affordable housing in the Opportunity Area, the text of the policy would benefit from being "subject to viability" rather than referring to 'abnormal development costs' to ensure consistency with national policy, guidance, and the adopted development plan.

The requirement for the type and tenure of new homes to be "especially attractive to younger households" is not considered to necessarily assist with meeting the vision of the plan. Provision of retirement living in the town centre may free up other homes in New Milton more suitable for young families, and therefore this form of housing should also be acceptable, and this part of the policy should be deleted.

Furthermore, it is unclear how the type and tenure is to be made especially attractive to younger households given that this is not specifically provided for within the district council's housing allocation scheme, nor is unlikely to specifically feature in the allocation of affordable housing by other bodies.

### **Policy NM7C: Town Centre Environmental Improvement Area**

Bradbeers supports this policy.

### **Policy NM7E Mitigating Effects on the New Forest Special Protection Area**

Bradbeers is broadly supportive of the objectives set out in New Forest District Council's Mitigation Strategy for European Sites SPD. However, draft policy NM7E not only requires residential development to accord with the SPD but also requires that financial contributions are provided to the proposed Greenway project in New Milton. It is unclear from the policy wording whether this applies to all proposed residential schemes or only to those that come forward within the town centre. If it is the latter, this should be made clear.

Whilst Bradbeers supports the concept of a Greenway route it does not consider this policy to be a reasonable approach, as it requires all proposals to provide a contribution beyond that required to mitigate the impacts of that development, which may be provided through an alternative means. This would also be in



addition to requirements set out in the district council's mitigation SPD. It would also be in addition to Community Infrastructure Levy requirements that apply to residential developments in New Forest District, a proportion of which is given to the Town Council.

Bradbeers suggest that this money, which the District's CIL 123 list intends to be used for habitat mitigation, but which it is acknowledged town/parish councils can spend on a wide range of projects to support the development of the area within which development is located, could be spent on the Greenway project.

In light of this Bradbeers requests that reference to funding the Greenway project should be identified as one option to mitigate the effects of development on the New Forest SPA. It should also be made clear whether this policy relates only to previously developed sites in the town centre.

#### **Policy NM8 Transport and Accessibility**

Bradbeers supports the principle of this policy. However, it is concerned that criteria iii relating to parking provision is overly prescriptive. In accessible locations such as the town centre the requirement of criteria iii to provide parking in accordance with the parking standards of the development plan doesn't provide enough flexibility where for some uses it may be desirable to have lower parking provided, or indeed for other uses higher levels of parking. Greater flexibility should be incorporated into this element of the policy.

Furthermore, Bradbeers is concerned that the requirements set out in criteria ii), iv) and v) do not fully accord with paragraph 32 of the NPPF and hence do not fully meet the basic condition to take into account national policies.

#### **Policy NM9 The Greenway Network**

Bradbeers broadly supports the concept of a Greenway, which will provide a valuable connected pedestrian footpath network within New Milton. Policy text should, however, identify the Greenway as one option to mitigate recreational pressure from residential development within the town centre as there may be other options available that are equally preferable to mitigate recreational impact. We note that the New Milton "Greenway" Mitigation Draft Report which forms part of the evidence base for the neighbourhood plan has not been published on the town council's website. This is a critical piece of evidence in relation to this policy, supporting the need for proportionate, robust evidence as set out in the NPPG. In light of its absence Bradbeers reserves the right to provide additional comments once this has been published.

#### **Policy NM10 Cycling and walking**

Whilst Bradbeers is broadly content with this policy we consider that clarification should be included that any financial contributions should be clearly related to the development and must meet the other tests contained in the NPPF and Community Infrastructure Levy Regulations 2010.

#### **Policy NM16 Design quality**

Bradbeers is supportive of this policy.

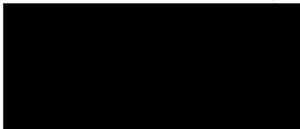


**Policy NM17 Connecting the Town**  
Bradbeers is supportive of this policy.

These comments have been made on behalf of Bradbeers in the spirit of assisting and supporting the neighbourhood plan process and we would be happy to discuss them should the town council wish to do so.

Thank you once again for the opportunity to comment on the draft neighbourhood plan and we look forward to continuing to work with you to bring forward regeneration of the town centre.

Yours sincerely,



Technical Director

cc



Bradbeers  
Andrew Hicks & Associates