



New Milton Neighbourhood Plan

Response to the Examiner's Preliminary Questions

Introduction

1. This response is made in answer to the preliminary questions put to the two local planning authorities and the Town Council from the independent Examiner into the Submission Draft New Milton Neighbourhood Plan (Examiner letter dated 30 October 2019).

Response to Preliminary questions for New Forest District Council

Question 1

General conformity and general consistency with the emerging NFDC Local Plan

2. New Forest District Council considers that the New Milton Neighbourhood Plan (NMNP) is in general conformity with the adopted Development Plan (Local Plan Part 1 / Core Strategy 2009, Local Plan Part 2 2014). This has been set out in the NMNP Basic Conditions Statement (May 2019).
3. On 1 November 2018 the Council submitted the Local Plan 2016-2036 Part 1: Planning Strategy, supporting documents and copies of representations made during the formal pre-submission publication period, to the Secretary of State for independent examination. The Examination hearings took place during June and July 2019. Following the close of the Hearing Sessions the Inspectors wrote to the Council to explain that they consider that the Plan can be found sound subject to Main Modifications, and further direction has now been provided to the Council detailing the Main Modifications deemed necessary for soundness. Main Modifications public consultation will take place after the purdah period for the national elections. A schedule of Main Modifications and supporting documents will be published on 13 December 2019, with the consultation closing on 31 January 2020.
4. The same inspectors examining the New Forest District Local Plan Review also examined the New Forest National Park Authority Local Plan (recently adopted on 29 August 2019). The approach to examining the two New Forest Development Plans is therefore consistent.
5. A number of Modifications are suggested to ensure consistency between the Local Plan (2016-2036) and the NMNP as follows:
 - Para 3.7 – Sub heading needs to be amended to “New Forest **District** Local Plan...” to aid clarification.
 - Para 3.8 – Reference to housing provision in the 3rd bullet point should read “need for **around** an additional 200 homes...”. This would reflect a Main Modification proposed to the draft plan (Ref. MM3).
 - Par 3.8 – Reference to type/tenures in the 4th bullet point should read “**All open market Hhousing on developments of 100 homes or more** to include provision of **a broad mix of new homes at least three non-standard types/tenures**”. This would reflect a Main Modification proposed to the draft plan (Ref. MM10).

- Para 3.8 – Reference to affordable housing in the 5th bullet point should read “**A target of 50% affordable housing to be delivered in the coastal areas of the District**”. This would reflect a Main Modification proposed to the draft plan (Ref.MM11).
- Para 3.8 - Replace reference to Suitable Alternative Natural Greenspaces SANG with **Alternative Natural Recreational Greenspace (ANRG)** as this more accurately reflects the Local Plan approach (as proposed to be amended) to recreational mitigation. Such a change would also require the Glossary to be amended to reference ANRG rather than SANG.

Question 2

Housing mix including meeting the housing needs of the elderly

6. The NFDC draft Local Plan (as proposed to be Modified) includes clear policies that encourage the provision of a diversity of new housing by type, size and tenure [Policy 16 (Housing type, size and choice) and Policy 18 (Residential accommodation for older people)]. The provision of homes that are suitable for older people is encouraged wherever practicable, including both specialised accommodation and general market housing that is attractive to active older householders and down-sizers. These policies will apply district wide and form part of the determination of relevant planning applications in New Milton, alongside the policies of the NDP, in due course.
7. NFDC therefore considers that the NMNP does not need to fully repeat all the emerging Local Plan policies to be generally consistent with the emerging Local Plan, nor that the NMNP needs to address all local plan-making policy requirements itself for the Development Plan as a whole to be consistent with the NPPF. The test is whether it introduces a potential policy conflict with the emerging Local Plan.
- 7.8. In this context NFDC consider that NMNP Policy 2 does not conflict with emerging Local Policies 16-18. NFDC consider that Policy NMNP Policy 2 is intended to be additional to emphasise, in the New Milton context, the need to include homes for younger people to achieve a more balanced local housing market. This is in line with Local Plan Policy 16, supporting text para 6.4. NFDC is satisfied that Draft NMNP Policy NM2 does not threaten or preclude the provision of a range / quantity of different types and tenures of home alongside the inclusion of homes for younger people. The NMNP steering group has received further analysis of population data and ONS 2016 population estimates that provides sufficient evidence for its approach.
- 8.9. NFDC Policy 16 also notes that evidence of housing need in the Plan area will be updated over time and development proposals will be assessed in light of the most robust and up-to-date information.
- 9.10. From the perspective of the National Park Authority, the recently adopted New Forest National Park Local Plan 2016 – 2036 (adopted August 2019) includes positive policy support for the provision of specialist housing for older people within the National Park (Policy SP20). This policy is a new addition to the statutory development plan for the National Park and supports: (i) extensions to existing specialist housing for older people outside the Defined Villages; and (ii) proposals which address an identified local need or requirement for specialist housing for older people within the Defined Villages. In addition, the Local Plan (August 2019) also allocates land at Ashurst Hospital for Use Class C2 care home use or extra care use. The Authority’s position is therefore that the needs of the elderly arising within the National Park are being satisfactorily addressed within the context of a nationally protected landscape (see paragraph 11, footnote 6 to the NPPF, 2019). The Authority has not objected to the approach proposed by New Milton Town Council in its draft Neighbourhood Plan.

Question 3

Policy 'NM4 Design Quality' accordance with the National Design Guide October 2019

~~40.11.~~ In the view of New Forest District Council the Neighbourhood Plan accords with the recently published National Design Guide. Policy NM4 is a comprehensive policy and provides a balanced approach that will contribute to creating well-designed development.

~~41.12.~~ However, it could be strengthened further. A number of Modifications are suggested to Policy NM4 to ensure consistency between the Neighbourhood Plan and the new National Design Guide, as follows:

- Policy NM4 vi. does not cause significant harm to the amenities, **health and wellbeing** of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, **outlook**, daylight and sunlight;
- New paragraph after 6.21: **"Where appropriate, the design of proposals should be informed by the 10 characteristics of 'well-designed places' set out in the National Design Guide"**

Question 4

NMTP Policy 10 and buildings of local heritage and landscape value

~~42.13.~~ The District Council is content that the buildings listed in Policy NM10 should be identified as having local heritage and townscape value. The Council does not hold a register of Locally Listed buildings, and Policy NM10 would provide an appropriate framework for any future proposals relating to the buildings set out in criteria (i) – (iii).

Response to Preliminary questions for New Milton Town Council

Questions for the NMTC (12)

Question 1

1. Evidence for the increasing imbalance in the demographic profile of New Milton

Ref 1: 1A New Milton File Note Age Occupancy

Ref 2: 1B New Forest Age Profile Forecast

Ref 3: http://www.newforest.gov.uk/media/34946/New-Forest-2011-Census-Headline-Factsheet/Pdf/2011_Census_New_Forest_Summary_Factsheet.pdf

Ref 4: http://www.newforest.gov.uk/media/36332/New-Forest-Economic-Profile-2018/Pdf/New_Forest_Economic_Profile_2018.pdf

Extract: The Core Forest & Coastal sub area has the largest concentration of elderly people in the New Forest district. The Hampshire (HCC) overlay highlights far fewer individuals from the youngest children in the population through to those approaching the end of their working lives at approximately 65 years of age. After this, the sub area shows much higher proportions of elderly residents than in the comparator areas.

Ref 5: Extracts from the Sustainability Assessment:

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.

5.42 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.

Question 2

2. Could the NMTC confirm that there is a University at Totton, as stated in paragraph 2.13?

No, this is an error - there is no University at Totton.

Erratum:

2.13 Around New Milton, colleges include Brockenhurst, Totton and Bournemouth College; and universities at Southampton, ~~Totton~~ and Bournemouth.

Question 3

3. Policy NM1- why Green Belt is not shown on the Policy Map

No need as it's on the Local Plan Policy Map; and the policy and supporting text are considered to provide sufficient clarity as to the boundary of the green belt.

Policy NM1 makes clear that land outside the areas marked New Milton and Barton on Sea on the Policy Map is in the Green Belt and this is confirmed in paragraph 5.4.

Question 4

4. Why the 'minerals area' isn't shown on Policy Map

No need as it's on the [Minerals and Waste Local Plan](#) policies map.

Question 5

5. Policy NM4: Plan for Caird Avenue Site
[A plan will follow asap for this site.]

Question 6

6. Pedestrian Pound: footnote

<https://www.livingstreets.org.uk/media/3890/pedestrian-pound-2018.pdf>

Question 7

7. Policy NM7: Cultural & Community Hub

Suggested amendment, as set out below:

Policy title:

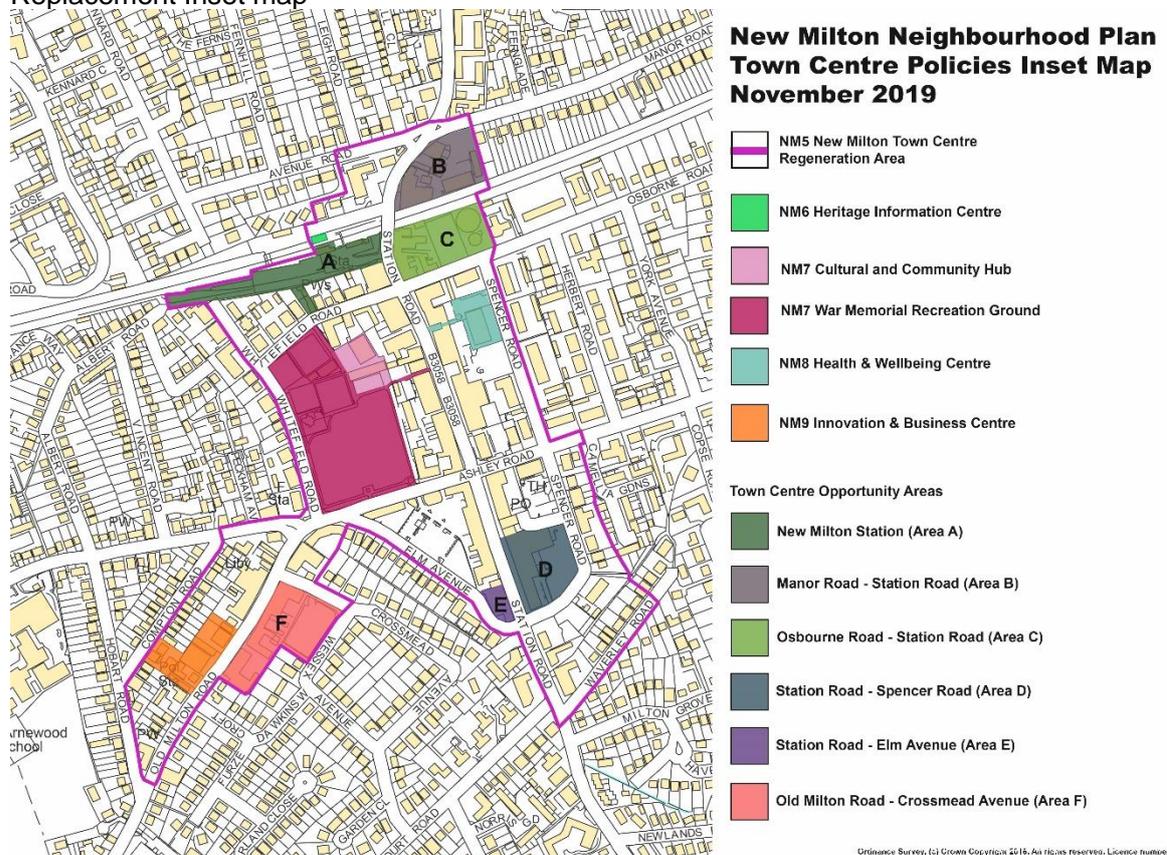
NM7 Cultural & Community Hub and War Memorial Recreation Ground

The town Centre Policies Inset Map has been amended to show more accurate placement of the Cultural & Community Hub within the Recreation Ground.

Town Centre Policies Inset Map [p77 of Plan]

Amendment:

Replacement Inset map



Question 8

8. Policy NM10: Advice to owners of structures identified

Owners of the three structures identified have been sent a letter from the Town Council to inform them of the policy. We advised that there could be implications should any development be proposed as the policy purpose is to protect the building due to its historic importance.

Question 9

9. Policy NM12: Justification for the 8m buffer

This was a request from the Environment Agency in their Reg 14 comments. They require an 8m buffer either side of the stream which is a known sea trout migratory and spawning stream and also has eel present. It is also thought to have a small population of water vole.

Question 10

10. Policy NM13: Exclusion of 'seafront' and 'Becton Bunny'

The New Milton Local Distinctiveness Study (NMLDS)¹ – SPD 2012 includes maps which show the boundaries for Becton Bunny (Character Area 7), Barton Seafront (Character Area 8) and Barton Gardens (Character Area 9).

Long Meadow is not referred to in the supporting text or identified on the Policy Map as it is illustrated on the Becton Bunny Character Area Map.

Erratum:

Amend heading 'Gardens' to 'Barton Gardens'.

Amend heading 'Seafront' to Barton Seafront'

Question 11

11. The role of NMTC in monitoring

New Milton Town Council's role will be to act as guardians of the Plan and to keep the content and implementation of the policies under review.

Suggested addendum, as set out below:

In an area where there is likely to be significant change, it is important that the adopted policies are appropriately monitored to ensure that any change in circumstances can be properly addressed. To that end New Milton Town Council will continue to act as guardians of the Plan and keep the content and implementation of the policies under review.

Question 12

12. Provision of a youth facility

A number of potential sites are being explored for this facility however no specific deliverable scheme has so far been agreed; and concepts are not yet at a sufficiently advanced stage to include as a proposal.

¹ [New Milton Local Distinctiveness SPD
http://www.newforest.gov.uk/media/29951/New-Milton-Local-Distinctiveness/Pdf/New_Milton_local_distinctiveness_final2.pdf](http://www.newforest.gov.uk/media/29951/New-Milton-Local-Distinctiveness/Pdf/New_Milton_local_distinctiveness_final2.pdf)