



NEW FOREST ASSOCIATION

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Dear Barrie

New Forest National Park Core Strategy (working draft v4)

Thank you for including the New Forest Association in the circulation of the working draft of the Core Strategy and Development Management Policies and allowing us an opportunity to respond with comments.

Overview

Naturally we have compared this latest version with the public draft produced last year and the currently operated planning policies for the New Forest inherited by you from New Forest District Council as the predecessor local planning authority for the great majority of the former New Forest Heritage Area. We find that there is a significant shift both in tone as well as policy. The document now lacks the clarity given by these previous documents that the planning policies for the New Forest are primarily intended to protect the New Forest culture and landscape and only to permit further new development within this context.

Throughout the document policies are now frequently worded in the style of “development will be supported....”. Apart from inferring a degree of pre-judgement by the Authority, this is totally inappropriate for the National Park Planning Authority dealing with an area where it has long been established that “development restraint” is a prerequisite for the long-term protection of the New Forest; and where considerable loss of character has been caused through the cumulative effect of much small-scale incremental development.

The document should be neutral in tone. Where development proposals are likely to be acceptable and be approved the policies should say “xyz development will be permitted, providing.....”, or where development proposals may be allowed but are likely not to be acceptable, policies should say “xyz development will not be permitted unless.....”. For clarity in some cases it will also be appropriate to have policies stating, “xyz development will not be permitted”, as in UP3.4 of the draft plan.

Spatial Vision and Spatial Objectives

The Special Qualities of the National Park set out in the Management Plan are referred to at various points and we are pleased to see that they have been repeated in this document. Similarly, we welcome inclusion of the Vision for the New Forest National Park.

However in their now abbreviated form they have been denuded of meaningful content to ground the Plan's policies in the physical and cultural context of the New Forest. **Both should be re-instated as set out in the draft plan** for the same reasons as we set out in our response to the revised draft of the Management Plan:

The Special Qualities of the New Forest should underpin all that follows, which is why the Authority rightly spent so much time honing them in lengthy discussions and workshops. Likewise the Vision should be sufficiently developed to be a picture of what is sought, not merely an outline sketch. As now presented, the Special Qualities and Vision are "simply" lists. The New Forest Association, along with many other organisations and individuals contributed many hours in workshops and an ongoing dialogue with the Authority to create both of these. While the draft plan has been severely criticised for certain policy issues during its consultation period we cannot find any substantial response questioning the Special Qualities and Vision as set out. They should be re-instated in the Management Plan as set out on 6&7 and 18&19 of the draft Plan.

The sub-visions for Countryside, Coast and Sensitive Landscapes; Rural Settlements; and Defined Villages do not add anything of spatial significance beyond that covered in the full version of the Vision and could be omitted.

We are perplexed by the Spatial Objectives. The Plan states that, "they take into account the objectives in the National Park Management Plan; the relevant Sustainable Community Strategies...and the Regional Spatial Strategy". However, as written, they are no more nor less "spatial" than those in the draft Management Plan. In fact they are either the same, differently worded but with no discernible change in intended meaning, or slightly different. This is likely to lead to unnecessary future confusion (and potential legal argument). We recommend that the Authority settle on one set of objectives for the National Park, capable of providing contextual policy guidance for the Management Plan and the Core Strategy.

More importantly the former Objective P3, "Maintain, extend and enhance the tranquillity of the National Park" has been omitted. **This objective, which was a priority objective in the consultation draft plan, is equally important in spatial planning as for Management Plan purposes and should be re-instated in this document.**

Core Policies and Development Management Policies (in Plan order)

We are greatly concerned to see that Policy DC1 of the consultation draft plan has been dropped and strongly object to its omission.

It is of great importance that the policy framework of the spatial plan for the National Park should be clearly underpinned by a simple and unambiguous strategic policy overarching all detailed policies to be used in the consideration of development proposals within the National Park. This should put the long-term protection of the New Forest as the over-arching consideration to be returned to whenever there is any doubt in determining development proposals. Throughout the past three and a half years we have attended the Planning Development Control Committee, have listened to the comments of Members and have talked to them informally after meetings. Often the 'complaint' of Members has been the lack of such a policy in inherited plans and frustration at having to wait for the "Park's own plan" so as to remedy this situation. We are, therefore, both surprised and dismayed that

Policy DC1 has been omitted in this revision. **It should be re-instated:**

The conservation and enhancement of natural beauty, wildlife and cultural heritage will be given priority over other considerations in the determination of development proposals.

Development will only be permitted where it does not significantly increase human or animal pressures on the National Park. New buildings, extensions and alterations should enhance the built heritage.

Policy CP4

There should be no place in a national park spatial strategy, where provision is specifically made by the national park planning authority for its support of development which has a significant adverse effect on the park's special qualities. There are many very different ways to secure renewable energy and to achieve renewable energy targets. Those that would harm the Special Qualities of the National Park should not be permitted. Such a proposal would, quite simply, be the wrong scheme in the wrong place.

The third bullet point of CP4 should be deleted

Policy CP5

Light pollution has been one of the most insidious aspects of suburbanisation of the New Forest in recent years. Too often 'safety' reasons are claimed by those more comfortable in a town than in the countryside location where they have chosen to live. Village street lights and security lighting have increasingly eroded the quality of dark skies. While safety will be a legitimate consideration, it should not be offered so explicitly and readily as an exception to the intent of this policy.

The final sentence of CP3 should end at ".....eroding rural darkness."

Policy DP7

This policy is potentially confusing. It would be better to split small-scale convenience shops within rural settlements and farm shops into two separate sentences. Farm shops not within settlements

should then be clearly limited in the produce that may be sold. Convenience shops provided outside settlements as part of farm diversification would be likely to undermine the viability of existing village shops.

Policy CP10

The Plan itself recognises that housing development in each of the past 8 years has exceeded the Regional Spatial Strategy requirement. The Plan also states that, “there will need to be a balance in provision between social rented and intermediate housing”

The Plan fails, however, to take sufficient account of the scale and geography of the New Forest, which is not a remote rural area, and the extent to which housing provision is being met in the surrounding market towns.

The focus on affordable housing within the National Park should be on local need, rather than housing delivery; and must maximise the very limited site opportunities that arise. The approach taken of looking to market housing development to provide some social housing within an economically viable package is seriously misguided. At least half of the available sites will be lost to further market housing development not needed in the New Forest. Furthermore in the quest for viability within each development proposal it is likely that intermediate housing will predominate, so not meeting the most acute local housing needs.

Once developed, site opportunities are effectively lost forever. The policy should be framed so as to maximise site utilisation for social housing, with the local planning authority working in collaboration with local housing associations or others who are able to bring external housing funding into developments.

Policy CP10 should specify the proportional mix of social rented and intermediate housing required and should not rely on market housing alone to fund the provision of social housing. Within the defined villages at least 50% of the development should be for social rented housing with the balance being intermediate housing and not more than 25% market housing. On exceptions sites at least 75% of the development should be social rented housing with the balance being intermediate housing.

Policy DP9

We support the change to this policy to allow the siting of replacement dwellings to be different to the original building where there are environmental benefits

Policy DP10

This policy should marry with Policy DP9 to avoid there being a difference in the size of dwelling permitted through extension or replacement unduly influencing the less sustainable building option being taken

Policy DP11

We are concerned that home-based businesses may be hard to define compared with home working. The use of domestic outbuildings for home-based businesses should specifically require planning

consent. Conditions and monitoring will be essential if new employment premises are not to be established and grow in unsustainable locations. **The text should be re-worded to make this clear.**

Policy CP15

By including both, “either enhances, or does not detract from” in this policy effectively sets the test at the lower level of “does not detract”. Tourism is the one economic activity above all that relies on the Special Qualities of the New Forest as its ‘product’. It should, therefore, always be seeking to enhance them in the course of any development.

We would prefer the policy to just say “enhances”.

Previous Policy UP3.4 has been deleted. **For the avoidance of doubt, the text below Policy CP15 should include, “Major development of new or existing visitor attractions or accommodation within the National Park will not be permitted”**

Policy DP17

We welcome the intent of this policy but it is unnecessarily limited and should also allow for the possibility of complete or partial site relocation elsewhere and not just adjacent to the existing site. The policy should be altered to say, “**New or** extensions to existing holiday parks, touring caravan or camping sites will only be permitted to enable the removal of pitches from sensitive areas by the relocation of **all or** part of a site to a less sensitive area, providing:”

Policy CP16

The third paragraph below this policy is a serious weakening of the protection given to back-up grazing land. (See our similar comment about the draft Management Plan)

The final sentence should say, “agricultural land, which is used **or is capable of being used** for these purposes, is not developed....”

Policy CP17

This policy as now drafted has lost the purpose of previous policy LP3.1, which was directly related to improving the quality of life within villages and altering the balance of priority between traffic and pedestrians, cyclists and community use. It was directed towards making the National Park a better place. New policy CP17 contains ‘anywhere’ statements for improved accessibility. Specific examples should be in the text not the policy and the third bullet point, unqualified, is likely to lead to a steady erosion of local character. **The four bullet points should be replaced by:**

Reducing traffic and giving greater priority to pedestrians, cyclists and community use;

Supporting community and public transport; and

Supporting the development of an integrated network of footpaths, cycle routes and bridleways

Policy CP18

This is a reversal from a policy seeking to resist further development of the road network to one where examples of how further transport infrastructure (roads) may be supported.

There is no necessity for a policy to support an as yet unknown scheme for the A31. A blanket policy to support further as yet unspecified transport development (road building) where demand management measures are not feasible is alarming and given, for example, the history of Lyndhurst bypass proposals is not one we expected to see in the National Park Authority's Plan. Safeguarded transport schemes do not require a further policy to safeguard them. **This policy should be deleted from the plan. If necessary include some discussion of transport infrastructure issues in the plan text, but without even conditional support in advance of full evaluation of any future schemes that may be proposed.**

Other policies

Former policy PP2.4 has been omitted from this draft. It dealt directly with the issue of cumulative damage from small-scale incremental development and warrants being included as a Core Strategy policy.

Policy PP2.4 should be included as a Core Strategy Policy

The Authority will seek to prevent small scale built development and changes of use that cumulatively erode local character and result in a gradual suburbanising effect within the National Park

There is no policy for Conservation Areas or Listed Buildings. While strictly not necessary in this document is it something that readers might expect to find in a National Park Core Strategy / Development Management Policies?

We cannot find a policy for advertisements. Is this intended or a drafting omission?

Conclusion

Our aim is to collaborate with and support the National Park Authority in achieving a robust and clear local development framework intended to seek the long-term protection of the New Forest's Special Qualities. Having spent more time in the past three years responding to planning applications and attending your Planning Development Control meetings than any other consultee or stakeholder, we feel we can fairly claim to have a good understanding of the working of current planning policies and their deficiencies; and to be well placed to know what is required of the new Core Strategy and Development Management Policies.

We are concerned that as currently re-drafted the plan is lacking in some parts and overall represents a weakening of intent and policy for the protection of the New Forest compared with previous documents, which this Plan will supersede. Planning policies for the New Forest Heritage Area have been hard won over many years, including through successive local plan inquiries. It would be a great blow to the New Forest if some key issues, such as the protection of back up grazing land, were to be lost or diluted at this moment of Forest history.

We believe that the expectation of most people who supported the creation of a New Forest National Park, was that the new Authority would consolidate and build on previous plans to give long-term protection to the New Forest. In contrast, and unlike the consultative draft planning policies, which we supported, the combination of style and revised policies in this plan are likely to lead to more rather than less cumulatively harmful development than in the recent past.

It would be a great disappointment for the Association not to see a Version 5 of this plan, which we can fully support as the first new part of the local development framework for the new National Park. We are mindful of the planning issues that, although few in number, have been most contentious and have dominated the consultation exercise. You will note that we do not make recommendations for any further revisions to these. We are, therefore, confident that incorporation of our recommended changes set out above would greatly strengthen the Plan without offending others and will re-gain our support.

Yours sincerely

Peter Roberts
Chairman of the NFA Planning Committee