New Forest District
(outside the National Park)
Local Plan Part 2: Sites and Development Management

Please return to New Forest District Council by 15 November 2013

Please note that your representation will be made available for public viewing at Appletree Court, Lyndhurst and via the Council’s website. (Personal information such as signatures and telephone numbers will not be published on the website).

There are two sections –
Part A – Personal Details
Part B – Your representation(s).

Please fill in Part A, and a separate Part B for each representation you wish to make.

### Part A

<table>
<thead>
<tr>
<th>1. Personal Details**</th>
<th>2. Agent’s Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>* Mandatory field</td>
<td></td>
</tr>
</tbody>
</table>

**If an agent is appointed, please complete the Title, Name and Organisation boxes for your client in 1, plus the full contact details of the agent in 2.

If you have previously made representations on this Plan, please give your representee ref. here: 177

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Marc</td>
</tr>
<tr>
<td>Last Name*</td>
<td>Paronio</td>
</tr>
<tr>
<td>Job Title</td>
<td></td>
</tr>
<tr>
<td>(where relevant)</td>
<td></td>
</tr>
<tr>
<td>Organisation</td>
<td></td>
</tr>
<tr>
<td>(where relevant)</td>
<td></td>
</tr>
<tr>
<td>Address Line 1*</td>
<td>16 Ashleigh Close</td>
</tr>
<tr>
<td>Line 2</td>
<td>Hythe</td>
</tr>
<tr>
<td>Line 3</td>
<td>Southampton</td>
</tr>
<tr>
<td>Line 4</td>
<td>Hampshire</td>
</tr>
<tr>
<td>Post Code*</td>
<td>SO45 3QP</td>
</tr>
<tr>
<td>E-mail Address</td>
<td></td>
</tr>
</tbody>
</table>

(Where an email address is given, this will be used as the primary means of contact)
Part B – Please use a separate sheet for each representation
(\textit{Part A MUST also be completed})

Name or Organisation :

3. To which matter does this representation relate?

\begin{itemize}
\item[i.] Main Modification to the Local Plan Part 2: Sites and Development Management

<table>
<thead>
<tr>
<th>Main Modification Ref. (i.e. MM1)</th>
<th>MM14</th>
<th>MM52</th>
<th>Local Plan Part 2: Para. or Policy number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>DM7</td>
</tr>
<tr>
<td></td>
<td></td>
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<td>BLA1</td>
</tr>
</tbody>
</table>

\item[OR] ii. The draft Mitigation Strategy Supplementary Planning Document

<table>
<thead>
<tr>
<th>Draft Mitigation Strategy</th>
<th>Paragraph No. or Project Reference</th>
</tr>
</thead>
</table>

\item[OR] iii. If you wish to comment on the Infrastructure Delivery Plan tick here.

If commenting on a modification to the Local Plan Part 2 (including the revised Habitats Regulations Assessment and Sustainability Appraisal) please fill in sections 4 – 9.
If commenting on the draft Mitigation Strategy, please fill in section 10.
If commenting on the Infrastructure Delivery Plan, please fill in section 11.

4. On this matter, do you consider the Local Plan Part 2: Sites and Development Management is :

\begin{itemize}
\item[4.(1)] Legally compliant
\item[4.(2)] Sound*  
\end{itemize}

\begin{tabular}{|c|c|c|}
\hline
4.(1) & Legally compliant & Yes & No \checkmark \\
\hline
4.(2) & Sound* & Yes & No \checkmark \\
\hline
\end{tabular}

(* The considerations in relation to the DPD being ‘Sound’ are explained in the National Planning Policy Framework)

If you have entered No to 4.(2), please continue to Qu 5. In all other circumstances, please go to Qu 6.

5. On this matter, do you consider the Local Plan Part 2: Sites and Development Management is \textbf{unsound} because it is not:

\begin{itemize}
\item[(1)] Justified
\item[(2)] Effective
\item[(3)] Consistent with national policy
\end{itemize}

\begin{tabular}{|c|c|}
\hline
\checkmark & \checkmark & \checkmark \\
\hline
\end{tabular}
6. Please give details of why you consider the Local Plan Part 2 (as proposed to be modified by the Main Modifications) is not legally compliant or is unsound on this matter. If you wish to support the legal compliance or soundness of the Local Plan Part 2: Sites and Development Management, please also use this box to set out your comments.

There is evidence of a contradiction in site BLA1 being put forward with the proposed **Policy DM7**: Protection of public open spaces, *private recreation* land and public open spaces.

At the hearing on the 23rd April 2013 of this year the Local Authority played down the current use of the land as being for a *private* members golf facility and, possibly with Policy DM7 in mind, said that there could be an opportunity for the land that was to be lost to the development to be made up by purchasing the land adjacent to the golf course to compensate. However, they admitted that the adjacent land was not in the ownership of the private company that owns the golf course and that there was no right for them to buy the land to do this. The **Policy DM7** refers to a proposals map and the land adjacent to the Doctor’s surgery should be included where it is a large tract of land used for *private recreational* purposes and therefore should be safeguarded from development if the conditions of the policy cannot be met.

Even if the land adjacent could be purchased to replace the golf course lost to development this would be contrary to the Local plan policy of safeguarding land used in connection with the forest as the land is used for producing hay and the hay is purchased by both commoners and private horse owners alike in the area.

The plan is unsound where the site BLA1 should include for replacing the private recreation land lost to the development by *equivalent or better provision in terms of quantity, quality, and accessibility, in a suitable location*, in accordance with Policy DM7, but even if this was guaranteed the replacement land should not be the adjacent fields where these are used in connection with commoners and the New Forest National Park.

In addition, where the land is used as a golf course, it is potentially not just the section of land that is to be subject to development that should be replaced as the remainder of the golf course, without this section of land, may become useless for this recreational activity.

Where Policy DM7 and its associated proposals map should apply to the site at BLA1 and where there is no mention that replacement land will be provided in a suitable location, within the current conditions specified for the site, the site BLA1 should be regarded as unsound in guaranteeing to meet the housing need for the area.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound on this matter, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of the relevant policy or text. Please be as precise as possible.

The object of the local plan is to ensure that the local housing need can be addressed and, without the safeguard of there being replacement recreational land where BLA1 is sited on private recreational land, the housing cannot be guaranteed to be provided. I would suggest that in the first instance the conditions to be met for site BLA1 includes reference to policy DM7 and that equivalent or better provision in terms of quantity, quality and accessibility in a suitable location will be provided. However, where this cannot be on land that is used in connection with the forest it may be better to reduce the land allocation on site BLA1 to an extent where it only makes up the shortfall for housing being provided elsewhere.

In order to meet this, site BLA3 should be put forward, where it has been subject to an ecology survey that drew no adverse comments or conclusions, to provide the bulk of the housing (24 units) and the site at BLA1 be used only to provide the remaining 6 units and other recreational land.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change to the Local Plan Part 2, do you consider it necessary to participate at the oral part of the examination?
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It should be openly debated as to why Policy DM7 has not been applied to site BLA1 and where the replacement land will be provided to meet the requirements of this policy.

As the representative for the trustees that own site BLA3 I can provide any information required as to the suitability of the land where it has been put forward as an alternative.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Comments on other documents, for consideration by NFDC.

10. Please state here your comments on the draft Mitigation Strategy.

No Comment

(Continue on a separate sheet / expand box if necessary)

11. Please state here your comments on the Infrastructure Delivery Plan.

No comment

(Continue on a separate sheet / expand box if necessary)

Signature: __________________________ Date: __________________

Representations should be posted to: Policy and Plans Team
New Forest District Council
Appletree Court
Beaulieu Road
Lyndhurst
Hampshire
SO43 7PA

Representations should be received by no later than 5pm on 15th November 2013.

Or e-mailed to: sdmrepresentations@nfdc.gov.uk