Dear Sirs

NEW FOREST LOCAL PLAN PART 2: SITES AND DEVELOPMENT MANAGEMENT - RESPONSE TO MAIN MODIFICATIONS DOCUMENT – THE TRUSTEES OF THE BARKER MILL ESTATES

On behalf of our clients, The Trustees of the Barker Mill Estates (TBME), please see below our response to the Main Modifications Document for the New Forest Local Plan Part 2 - Sites and Development Plan Document.

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<th>Modification</th>
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| MM10         | The Habitats Regulations Assessment (HRA) concludes that to mitigate the impact of the planned level of housing provision on SPA’s, around 80Ha of SANG would be required, if dealt with by such means alone. The Council concede that they have only been able to identify land for less than half of this, with existing open space / footpath connectivity improvement projects and windfall sites proposed in lieu of the remainder. The latter implies less clarity and certainty than we felt the Inspector had requested in his note from the Examination of Local Plan Part II. Greater certainty is required on such matters in our view to give reasonable confidence that the level of housing proposed is deliverable and will not be unreasonably held up or capacity reduced by a lack of available mitigation measures.

For example, we are unaware of approaches being made to landowners by the Council to determine the availability of lands deemed suitable for SANG provision in the plan area. The availability of Cockleydown Copse to the west of the policy TOT1 site being just one that our clients have previously suggested that the Council could allocate for informal recreational use. Similar to a SHLAA exercise we would have envisaged the Council making such approaches to demonstrate they had explored all deliverable options to allocate SANG lands, not just from sites allocated for development.

The Council make clear at paragraph 5.26 of document NFDC46 that the priority to provide SANG will override the need to make up shortfalls in formal open space provision. In essence there are insufficient perceived opportunities to allocate additional...
land for both SANG and formal open space needs. Again we are unaware of approaches being made by the Council to landowners to determine whether additional lands could be made available or acquired in light of the SANG priority shift.

We note at paragraphs 2.30 to 2.34 of NFDC46 that the Draft Mitigation Strategy SPD will be amended following this consultation and will form part of the evidence base to the re-examination of Local Plan Part II. We therefore assume that the document will be revised to provide the Inspector examining the Local Plan Part II with reasonable comfort that the mitigation measures proposed will deliver the quantum of housing growth proposed in the Plan. We therefore wish to reserve the right to amend or withdraw these representations once we have seen the submitted version of NFDC46.

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<th>MM14 – Para 2.30</th>
<th>Our client supports the deletion of Policy DM8 and the Authority's intention to prepare the Green Infrastructure Strategy (Part 2) that will form a Supplementary Planning Document to the Local Plan Part 2.</th>
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<td>MM24</td>
<td>The acknowledgement that the precise location of stations may be subject to review during the plan period is supported.</td>
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| MM38              | **Land at Park’s Farm.** Our client would like to confirm that the Park’s Farm site is no longer in the ownership of the TBME (having been sold to Southampton Football Club) and as such can no longer be promoted by the TBME for the purposes of the Local Plan Part 2 draft allocation. To the best of our knowledge, the Football Club has invested significant monies into the site (see planning application reference 13/10844) and as such the site is unlikely to come forward for housing purposes during the plan period. We are aware that the Local Authority will still need to meet the requirements of Core Strategy Policy CS12 and the need for new housing development to meet local needs in the Marchwood area. As such, our clients would like to propose an alternative site for the purposes of the allocation. The attached plan identifies an area on a site known as Tavell’s Farm that is located to the north of the existing solar farm adjacent to Tavell’s Lane.

The site benefits from a number of advantages:

- It is within a single ownership (TBME);
- It is well located in terms of proximity to local facilities and services;
- It is an unconstrained and straightforward site (this is further supported by the site’s recent use for extraction purposes);
- It is likely that access could be achieved from either Tavells Lane and/or Bury Road.

At this stage, a detailed masterplanning exercise has not been undertaken for the site however our client would be happy to enter into discussions with the Local Authority about how the site could potentially assist in meeting the requirements of the Core Strategy in the absence of Park’s Farm. |
With the above in mind, consideration may need to be given to the deletion of references to Park’s Farm throughout the document.

Our client supports the deletion of Policy MAR8.2 in relation to the provision of a train station at Plantation Drive and its replacement with supporting text (as referred to at MM24 above).

I trust these comments are duly noted and I look forward to receiving your acknowledgement of this in due course. For the avoidance of doubt, we confirm we would like to attend future sessions of the Examination to elaborate on such matters and to respond to debate as necessary.

. Should you have any queries, please do not hesitate to contact me or my colleague Rachel Lamb.

Yours sincerely

Stuart Irvine
Office Director

cc. Tim Jobling - TBME