Representations to the New Forest District Council
Local Plan Part 2: Sites and Development Management
Main Modifications

Representations

Prepared for
Hurst Castle Ltd and Lock Investments (Gore) LLP

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## Appendices

Appendix 1 Indicative Development Plan drawings
1. **INTRODUCTION**

1.1. We are instructed by our client, Hurst Castle Ltd, and Lock Investments (Gore) LLP, to make further representations to the New Forest District Council Site and Development Management DPD Examination in Public Consultation on Main Modifications.

1.2. Following the earlier Examination in Public, the Inspector suspended the examination, to enable the Council to undertake further work and consult on a schedule of modifications to the plan as proposed.

1.3. These representations are made directly to the proposed modifications, as set out in the Council’s document, entitled “Schedule of Main Modifications, New Forest District Council Outside the National Park Local Plan Part 2: Sites and Development Management Public Consultation” dated September 2013.

1.4. We set out our representations, listed by the main modification reference number and detailed below.
2. REPRESENTATIONS

Main Modification Reference MM68

2.1. We do not consider the allocation of 2 additional sites at land west of Moore Close and land off Park Road, Ashley to be sound within the Development Plan at this stage. We are concerned that the Council has not appropriately tested the evidence base for the allocation of these 2 sites. Indeed they sought to discount them through the Development Plan process. We therefore consider that they have not been appropriately justified within the context of the Plan.

2.2. We consider the modifications at paragraph 4.99, 4.100 and the addition of paragraph 4.101a should be deleted.

2.3. We make the case that the NMT1: Land South of Gore Road, East of the Old Barn, allocation should be expanded to accommodate the additional 30 dwellings required by the Inspector. Additionally, the site has the ability to accommodate the 5ha of employment land and the 90 units set out as part of Policy NMT4.

2.4. Accordingly, we consider that paragraph 4.99 of the main Modification should be deleted in reference to land off Moore Close and land off Park Road.

Main Modification Reference MM69

2.5. My client supports the addition of the bullet points setting out a requirement for mitigating measures to address surface water flooding, including service water runoff to the site from the adjoining highway, without increasing flood risk to adjacent properties.

2.6. This modification follows the conclusions of the Flood Risk Assessment, which was submitted prior to the EIP.

2.7. The Inspector’s Post-Hearing Note 4 (document reference ID/12), paragraph 3.11 considers Policy NMT1. The Inspector considers that the allocation is sound in principle.

2.8. As the allocation as set out at Policy NMT1 is considered sound, we make the case that there are no overriding considerations that would result in the policy allocation becoming unsound should it accommodate the additional development.

2.9. Appendix A shows potential expansion of Policy NMT1 to accommodate 30 and additional 90 residential units, together with 5ha of employment as two separate options. Both are considered sound and achievable, deliverable and viable. This will enable development to come forward early in the plan period.

2.10. Should an additional 30 units be accommodated within the NMT1 allocation, the site would also be able to accommodate allotments. Additionally, should the site accommodate the allocation proposed by NMT4, then the site could accommodate in the order of 60 allotments on the site. This would make a substantial contribution to allotment provision within the town.
Main Modification Reference MM70

2.11. The allocation of NMT1A: Land West of Moore Close has a potential for accommodating residential development but was discounted by the District Council due, in part, to its proximity to the Conservation Area to the north. The sustainability appraisal also points out that the development would have a negative impact on the character of the countryside and on locally important views from Christchurch Road.

2.12. We have seen no evidence that the site has the potential to mitigate against this impact and therefore we remain of the view that the site “Land off Moore Close” should not be allocated within the DPD until such time as suitable mitigation can be put forward.

2.13. None of the bullet points listed in the proposed policy seek to address the impact on locally important views from Christchurch Road, indeed they may not be achievable through mitigation as part of any development.

2.14. We therefore consider the proposed allocation unsound and it should be deleted.

Main Modification Reference MM71

2.15. Land off Park Road, Ashley is not appropriate development as it would significantly increase the density of development and change the character of the area in the context of neighbouring properties.

2.16. The requirement for on-site provision of open space and natural play space for young children, together with a landscape buffer, would result in a significantly decreased area for development. The provision of 5 full sized allotment plots also significantly decreases the amount of land available for development and we consider that the allocation does not have the potential to accommodate 20 new homes, as indicated at paragraph 4.102B.

2.17. We therefore consider the allocation of the proposed modification unsound as it is not effective and should be deleted.

Main Modification Reference MM74

2.18. The proposal seeks to provide on-site provision of suitable alternative natural green space on allocation NMT4. Whilst this is supported in principal, we are concerned that the development of NMT4 may not come forward during the course of the plan period. We therefore maintain the position that the site is not achievable or deliverable during the Development Plan, and the imposition of SANGS onto the development area further adds to the burden of requirements that increase pressure on the viability of this site.

2.19. We maintain the position that the NMT4 allocation should be deleted, and provision made on the NMT1 allocation for the additional 90 units and 5ha of employment land.
3. CONCLUSION

3.1. We are instructed on behalf of our clients, Hurst Castle Ltd and Lock Investments (Gore) LLP, to make Representations to the Schedule of Main Modifications, as set out by New Forest District Council's Outside the National Park Local Plan, Part 2: Site and Development Management document, public consultation for which starts in September 2013.

3.2. We consider that the proposed two allocations under NMT1A and B are considered to be unsound. In order to make the Development Plan sound, we consider an expanded NMT1 allocation to either incorporate the 30 additional dwellings the Inspector requires as part of Post-Hearing Note 4 (ID/12) or through the deletion of NMT4 and the allocation of an expanded NMT1 site to incorporate the additional 90 units of residential accommodation together with the 5ha of employment land.