Dear Sirs

NEW FOREST LOCAL PLAN PART 2: SITES AND DEVELOPMENT MANAGEMENT - RESPONSE TO MAIN MODIFICATIONS DOCUMENT

Thank you for your invitation to comment on the above consultation. I write on behalf of our client Solent Industrial Estates Ltd, who own land east of Caird Avenue, New Milton (proposed SDMDPD Policies NMT2-4).

The following paragraph/policy/modification specific comments are made within the current consultation parameters. Unresolved representations to the submission stage DPD consultation are therefore taken as read and not repeated.

One such matter we remain unclear about relates to the weight to be given to the Core Strategy DPD housing requirement against the NPPF. At the examination last year, there was discussion regards the soundness of proceeding with a district housing provision figure derived from a Core Strategy DPD adopted in 2009. We understood the Inspector was deliberating on this matter. The housing figures in the Core Strategy DPD not only pre-dated the requirements of NPPF, but are derived from South East Plan (SEP) requirements and housing needs evidence examined by the SEP Panel in 2006/7. The Council conceded at the Local Plan Part II examination that they had not objectively assessed housing requirements in accordance with NPPF, including any assessment of unmet needs from adjoining districts. We are unclear therefore to what extent the plan can satisfy the ‘Positively Prepared’ or ‘Justified’ tests of soundness in NPPF.

We would welcome the Inspector’s clarification on such matters as early as possible, particularly if this would avoid abortive works for parties preparing statements for the re-examination of the plan. We are aware the HBF and others are submitting more detailed representations on this matter. Whilst we are content to leave these points to be made by these parties, an early response to such matters from the Inspector would be welcomed.

Our reference: SOLW2002

Your reference:
<table>
<thead>
<tr>
<th>Modification</th>
<th>Comment</th>
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<tr>
<td>MM10 Policy</td>
<td>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 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 would therefore wish to reserve the right to amend or withdraw these representations once we have seen the submitted version of NFDC46.</td>
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| MM72 – Policy NMT2 | **Fifth bullet**
Our clients are keen to ensure that Policy NMT2 is effective and deliverable. The site has outline consent, therefore the policy revision would come into effect if a new (non-reserved matters) planning application were submitted or the existing expired. Whilst our clients have no objection in principle to the Council nominating the informal open space provision on this site as SANG under such future hypothetical scenarios, they seek further clarity and assurances on the following matters:

i. We have not seen Natural England's (NE) response as yet to this policy amendment, so we would wish to reserve the right to amend or withdraw our representation in response to this prior to the Examination. In the interim, we just seek confirmation that NE are content with on-site SANG provision of this scale (0.97Ha in NFDC46), as to date NE have referred many landowners / developers to guidance on their website entitled 'Accessible Natural Greenspace Standard', 2010 (ANGSt). This recommends such SANGs should be at least 2Ha in size and be of a particular design. Whilst paragraph 2.26 of document NFDC46 refers to ANGSt, it omits the NE criterion that such sites should be in excess of 2Ha. We would welcome confirmation therefore that NE is content with the 1Ha minimum standard, or 0.97Ha in this case, the Council believes to be appropriate for such SANGs in their Draft Mitigation Strategy (NFDC46). If so, it may be useful to clarify the SANG parameters that the Council and NE would seek to apply on allocated sites where one of the criterion is on-site SANG provision. |
| MM74: NMT4 | **Fifth bullet**
Our clients are keen to ensure that Policy NMT2 is effective and deliverable. The site has outline consent, therefore the policy revision would come into effect if a new (non-reserved matters) planning application were submitted or the existing expired. Whilst our clients have no objection in principle to the Council nominating the informal open space provision on this site as SANG under such future hypothetical scenarios, they seek further clarity and assurances on the following matters:

ii. We have not seen Natural England's (NE) response as yet to this policy amendment, so we would wish to reserve the right to amend or withdraw our
representation in response to this prior to the Examination. In the interim, we just seek confirmation that NE are content with on-site SANG provision of this scale (1.21Ha in NFDC46), as to date NE have referred many landowners / developers to guidance on their website entitled ‘Accessible Natural Greenspace Standard’, 2010 (ANGSt). This recommends such SANGs should be at least 2Ha in size and be of a particular design. Whilst paragraph 2.26 of document NFDC46 refers to ANGSt, it omits the NE criterion that such sites should be in excess of 2Ha. We would welcome confirmation therefore that NE is content with the 1Ha minimum standard the Council believes to be appropriate for such SANGs in their Draft Mitigation Strategy (NFDC46). If so, it may be useful to clarify the SANG parameters that the Council and NE would seek to apply on allocated sites where one of the criterion is on-site SANG provision.

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.

Please do not hesitate to contact me if you would like further information from us or would like to meet with our clients to discuss these comments in more detail.

Yours sincerely

Ryan Johnson
Director

cc. Michael Badcock – Solent Industrial Estates Ltd