

New Forest District Council

Local Plan Review – Issues and Scope Consultation

Fordingbridge Town Council Representations

Introduction

The Town Council welcomes the opportunity to influence the format, content and direction of the new Local Plan at this early stage, through a response to the District Council's Issues and Scope Consultation. As preparation of the new Local Plan progresses it is hoped that the District Council will not only be proactive in consulting with Parish and Town Councils but will actively engage with them so that the Review process, including the basis of decisions made, is fully transparent, explained and understood.

It is considered that this engagement should include not only the regulatory consultation stages, and associated opportunities to comment, but should also include regular face to face meetings at appropriate key stages as the District Council's intentions are being formed and become clear, especially in regard to the intended spatial development strategy for the District, the location / distribution of development and intended site allocations.

The Town Council believes that it will be important that the District Council not only communicates the intentions that will ultimately set the form and content of the draft Plan but also engages and fully explains how and why decisions are being made in the way they are and what evidence and assessment has influenced this. At a grass roots level Parish and Town Councils are key representatives of, and communicators to, local communities. It is vital therefore that we are fully briefed on matters related to the preparation and content of a new Local Plan in order that we can respond in an informed way to the questions and concerns likely to be raised by our communities.

A commitment by the District Council to full and meaningful engagement will be especially important to Council's like Fordingbridge where

significant strategic development has previously been allocated by the current Local Plan and where a decision has been made to progress a local Neighbourhood Plan that will need to be in conformity with the strategic policies of the new Local Plan.

It is likely that the preparation timescales of the new Local Plan and the proposed Fordingbridge Neighbourhood Plan will be the same and run in parallel. It is important therefore that early consideration is given to how the Local Plan will treat Neighbourhood Plan areas in terms of not only development site allocations but also the relationship in respect of place shaping and development management policies, to avoid duplication and possible confusion. Early discussion between the Councils regarding these matters is considered important.

Review Focus, Plan Vision and Plan Period

Based on our experience of the preparation of the current local plan the Town Council has several serious concerns regarding the focus of the plan review, the revised plan Vision and the intended plan period.

The Plan Review should have a comprehensive but more balanced approach and one that does not focus on housing at the expense of all other issues/concerns.

Whilst acknowledging the key objective of local plans is to address the development needs of an area it is considered that previously this was at the expense of the wider place making role. As a result, there was a lack of consideration of an overall future vision for Fordingbridge, other than at a very superficial generic level. The new local plan should address these shortfalls by articulating a clear vision for Fordingbridge and one that takes account of not only any further future development but also that which is already permitted, and underway, as a result of the current local plan allocations.

Influenced by the direction of national planning policy and the experience of recent years of plan making it is considered that future local plans will be the subject of almost constant review, on a rolling programme, especially in instances where a Plan does not meet an area's defined development

needs. For this reason, it is considered that the new Local Plan should only look ahead for a period of 15/20 years.

Spatial Strategy and Settlement Hierarchy

The Town Council considers that the current Plan strategy is in need of review not least because greater weight needs to be given to the principle of brown field first but also because following changes to national planning policy/ guidance consideration needs to be given to the contribution and role of grey belt land and to further green belt release.

Where brown field site development has stalled the full reasons for this need to be investigated and understood, and a strategy / action plan put in place to address this.

It is considered that existing settlement hierarchy should be reviewed and should include all levels of settlement so that a comprehensive picture of development capacity is available. It is also considered that the existing methodology should be changed to provide a more realistic assessment of the situation on the ground. Any revised methodology used to inform the revised hierarchy should be explained fully to Parish / Town Councils.

The description and assessment of settlements as being “sustainable” is not necessarily accurate when the reality of the situation is considered.

Whilst being identified within the highest tier, by the current Local Plan, and as a result being allocated a disproportionate level of strategic site developments relative to existing size and facilities, Fordingbridge has not seen the resulting increase in infrastructure and services often used as a reason to justify the increase in development. Public transport is limited and there remains a dependency on car use without any redress to existing highway capacity and safety issues. Employment provision has not increased and levels of outward commuting for work remains high. There has been no investment in the town centre/high street and health services have not grown. The Town Council believes that the status of being a sustainable location is misleading and needs to be explored and justified if the high hierarchy ranking is retained.

Housing Need, Density, Stalled Sites, Affordable Homes and Neighbourhood Plans

The Town Council considers that a level of housing need identified on the basis of the national planning policy standard methodology cannot be achieved to any significant level, due to the multiple and considerable physical and environment constraints that apply across the district.

The ever-outward expansion of towns through development of edge of settlement sites is not considered realistic and cannot be continued indefinitely. The urbanising affect and impact on the character of Fordingbridge and its surrounds is already clear from the development of the current strategic sites. Therefore, brownfield sites and grey belt sites should play an increased role.

Fordingbridge has already seen a disproportionate level of strategic sites allocated through the current Local Plan to the extent that if the current standard methodology was used to calculate a local parish level of housing need, then this would show a 15 year supply based on existing planning permissions.

Unlike other allocated sites elsewhere in the district allocated sites in Fordingbridge have progressed, and not stalled, with planning permissions being granted and starts on site commenced. It is important for the District Council to have a full understanding of why other sites have not come forward or have stalled and what needs to be done to address this.

It has also been the case that when detailed planning applications come forward on allocated sites the number of units proposed has been in excess of the number identified at plan making stage demonstrating that there is potential to increase numbers and densities when appropriate. Urban and town centre locations and sites are likely to be more suitable locations for increased densities.

Despite the level of development proposed for and underway in Fordingbridge there is no evidence to suggest that market housing prices are reducing to a level that is truly affordable for local young people. Provision of a range of first and second time homes as part of

developments is still necessary as is some form of local connect priority policy or initiative.

Despite the current local plan being subject to some previous viability testing, at preparation stage, experience of subsequent proposals at application stage demonstrates that achievement of policy compliant affordable housing provision has not been possible. It is considered that all strategic and major development allocations should be subject to site specific viability testing to show that all intended policy requirements/criteria can be achieved in full.

As already commented given that Fordingbridge is in the process of preparing a Neighbourhood Plan it is important that early consideration is given to how the new Local Plan will treat Neighbourhood Plan areas in terms of the not only development site allocations but also the relationship in regard to place shaping. Further discussion on these issues should take place with the District Council at an appropriate time once more is known of the likely direction of the draft Local Plan.

Infrastructure (Physical, Green and Social)

Whilst the difficulties of engaging with infrastructure providers, other than the Council itself and site developers, is recognised it is considered that more needs to be done to ensure that all types of necessary infrastructure are not only identified and planned for but are also delivered before or in parallel with development.

Whilst physical and green on/off site provision can often be more easily achieved through developer contributions, or direct developer provision, the social infrastructure that communities expect is frequently lacking or non-existent. Relevant agencies and organisations frequently rely on developments addressing their own needs / mitigating impacts but fail to address underlying existing deficiencies in service provision. This is especially the case with Hampshire County Council in its role as Highway Authority. The Access Strategy produced for Fordingbridge, and the draft New Forest Local Cycling and Walking Infrastructure Plan are both examples of many improvement ideas being promoted but with no financial resources to deliver them.

As regards arts and culture local groups in Fordingbridge are working together to prepare and implement a local strategy with the objective of delivering a specific arts and culture profile for the Town. The possible inter relationship between the District Council's Cultural Strategy, the emerging draft Local Plan and this local initiative needs to be explored.

Green Spaces

It is considered important to maintain and reinforce a network of green spaces in and around settlements of the district especially those likely to be subject of growth. The Town Council supports setting minimum standards of access to green space.

Green Belt

The District Council's previous green belt study is nearly 10 years old. A new study needs to be carried out to establish what boundary changes are appropriate, if any, in order to accommodate development need. The need for a new study and green belt review is further necessary given changes made to national planning policy / guidance and the introduction of "grey belt" land.

Open Space, Formal and Informal Recreation

It is considered important that a full picture of existing provision is established, including identification of any local deficiencies, through the carrying out of relevant studies. The policy response / approach should take account of all types of provision including creating new larger sized destinations, sports pitches, smaller scale areas, and a new country park if possible.

Where provision / improvements are to be funded by developer or CIL off site contributions it needs to be clear what projects are to be funded, the location and purpose.

Employment, Town Centre uses

Existing viable employment sites and uses should be protected to retain local employment opportunities and reduce the need to commute.

The focus of Fordingbridge town centre retail policy and defined frontages should be to protect the core shopping area and key store locations. Attracting a mix of variable uses and services across the town centre area should be an objective to encourage local use. Opportunities for investment, regeneration and public realm improvements should be investigated aligned with an overall Vision for the town.

Viability

As commented above it is considered that all strategic and major development allocations should be subject to site specific viability testing to show that all intended policy requirements/criteria can be achieved in full.