

**COPYTHORNE PARISH COUNCIL RESPONSE TO NFNPA LOCAL PLAN REVIEW –
REGULATION 18 (PART 2) CONSULTATION**

POLICY	POLICY HEADING	RESPONSE	COMMENTS
SP1	Supporting sustainable development	SUPPORT	Is the transport strategy robust enough to support these ambitions? SP1 a) I support the improved public transport links. SP1 f) great to see climate change resilience being addressed. Need to guard against national policies and directives that are in opposition to principles but over-ride them, giving purely a “top down” approach. Support and improve local transport links, five working days, Saturdays too, parish only has buses two days a week currently Traffic pollution an issue. Improve cycling/walking routes.
DP2	General development principles	SUPPORT	(f) and (g) use the word unacceptable. A word that is not clearly defined and open to interpretation. (h) Active travel can only be enabled with well maintained and safe pavements and cycle lanes. DP2 g) how would adverse impacts associated with traffic and pollution be addressed in the absence of suitable public transport or healthy walking and cycling routes? Small electric vehicles? These are very worthy aims, but difficult to balance against the new developments proposed later in the document. How will developments be measured objectively against subjective aims? Electric vehicles would help the traffic pollution issue.
SP3	Spatial Strategy	SUPPORT	The defined village named Cadnam-Bartley on the proposed plan needs to have the name confirmed. I would like to know what is the reason the NFNPA want to make some of our parish a defined Village. Is it with the hope that there will be an increase in new dwellings? 4.13 Strongly support the focus of addressing local needs. 4.15 Copythorne does not meet this policy in terms of public transport, walking or cycling focus to neighbouring Totton, Lyndhurst or Romsey for delivering new housing to help address local needs while at the same time ensuring development does not compromise the delivery of the two statutory National Park purposes – national planning policy recognises that national park authorities have an important role to play in delivering housing for local people within the context of a nationally protected landscape for example health appointments. 4.19 states it “seeks to sustain and enhance the local services and facilities” in Cadnam-Bartley. Does this include transport? This policy should be examined more carefully and imaginatively to address the perceived need for more housing in the National Park.

SP4	Major development in the National Park	SUPPORT	Maximising transport opportunities is essential when looking at major developments. In the parish of Copythorne we have the tourist attraction Paultons Park. As the park grows, it becomes more important that traffic management and public transport is addressed. Although I support this policy, I am bothered by the effect any large major urban development would have on the rural Parish of Copythorne. 4.32 This policy has a major impact for parishes such as Copythorne which has a major tourist attraction. In SP4, what national considerations would override the statutory purposes of the National Park? How big would the negative impact on the local economy override the first statutory purpose? Copythorne has a huge tourist attraction and is a gateway to the New Forest
SP5	Land to north of Fawley Waterside	SUPPORT	Although I am in support of this proposal, I have concerns regarding traffic congestion. My concern is that as the A326 gets more and more congested and drivers will be encouraged to take a detour through the National Park. Although I support this particular policy I am never the less concerned that this is just Stage One in eventually developing the whole of the Waterside into one vast Freeport SP5 iii. To create opportunities for active travel, through the creation of cycle routes and footpaths, to link to surrounding settlements and employment sites; Complete cycle and footpaths linking more hamlets across the areas for the workforce. Re-opening the Hythe Ferry and "Waterside" railway line too.
SP6	Infrastructure provision and developer contributions	SUPPORT	4.45 – should some of this detail be added to SP5 to ensure it is fully robust? Does the last sentence (<i>"In implementing this policy regard will be had to economic viability considerations at the site-specific level."</i>) give permission to the developer and planning officers to ignore the details of this policy? 4.47 Can more information be provided on how the process will work with regard to the authority and interaction with local residents to determine the extent of new/improved infrastructure needs. The last sentence of the policy 'In implementing this policy regard will be had to economic viability considerations at the 'site specific level' seems to indicate that a developer could make an argument that infrastructure improvements could be too costly to be carried out? Is this the case? If so, surely if infrastructure improvements can't be delivered then the development shouldn't proceed. Planning officers should not ignore re-opening of Hythe Ferry

SP7	Safeguarding and improving water resources	SUPPORT	5.25 should be re-worded to include Bartley with Cadnam as a known surface water flooding area. Great to see the climate change emergency (5.10) and Race to Zero (5.9) initiatives in the Plan. Agree with reducing the max allowable daily usage per person to 100 L/day Broadly support this policy, however point e) the 100 litre usage? How can this be achieved and enforced? Is this applicable to all new homes regardless of size? Increase water testing and daily usage resources The inclusion of a preference for “Nature based SuDs” (clause c) is also supported.
SP8	Flood Risk	SUPPORT	5.25 should the Cadnam area be reworded Cadnam-Bartley as both these areas have been prone to surface water flooding. More clear drainage maintained. No more building on wetlands. Bartley/ Cadnam are High Flood Risk areas. Various parts of Copythorne has a history of high flood risk, not to be ignored. Any more dwellings built in flood risk areas will increase the risks from surface water.
SP9	Sustainable Construction	SUPPORT	Pleased to see support given to proposals for development that mitigate and adapt to the impacts of climate change. Consider adding Surface Water flooding under (f) 5.30 What are the improved building standards to be applied to extensions and thermal upgrades? SP9 b) should “consider” be rephrased more strongly to “should have”? Would an applicant have to provide evidence that they have considered “small-scale” renewable. Correct sustainable construction of all dwellings using high quality materials to cover all aspects of the build, drainage and sewer infrastructure.
SP10	Renewable Energy	SUPPORT	The plan should encourage the installation of solar panels over car parks and car ports (an example of this is Paultons Park). However, I am against ground mounted solar panels in residential gardens

SP11	Nature conservation sites of international importance	NEUTRAL (as currently presented – See comments)	The last sentence seems to be designed to allow developers to develop the site regardless of impact. 6.8 “a target of 80% of SSSIs within the New Forest National Park to be in favourable condition by 2042” How does the SSSI site bordering Barrow Hill Road rank in terms of returning to a favourable condition? The final bullet point states “Applications for new net dwellings and other forms of overnight accommodation will be required to demonstrate nutrient neutrality”. Why does it not apply to other buildings such as residential outbuildings, large extensions etc? Is this addressed elsewhere in the plan? Any overnight sites, caravans, wild camping should provide correct facilities to demonstrate nutrient neutrality.
SP12	The natural environment, national; regional; and local	SUPPORT	The 2nd and third sentences are a complete contradiction Does SP12 apply to extensions and outbuildings? 6.23 I support the 10% Biodiversity Net Gain. Second paragraph - the first part states that developments impacting SSSIs will not be permitted, then the second part says some may be considered? Which is it?
SP13	Biodiversity Net Gain	SUPPORT	Biodiversity net gain being delivered in a hierarchical manner is good. How will the National Park ensure that the applicant monitors that a 10% biodiversity net gain is achieved? I am against developers being able to buy national biodiversity credits I agree with the hierarchy proposed 6.26 Great to see the reference to Bird bricks in new builds.
SP14	Landscape Character	SUPPORT	‘Development proposals will be permitted if they conserve and enhance the character of the New Forest’s landscapes’. I'm not convinced that all new developments will actually enhance the character! I am against development within SSSI’s, I don’t believe any development can enhance. 6.32 - I agree with “<i>Landscape character cannot be solely determined by what is visible from a publicly accessible location, as this can change over time.</i>” I strongly agree with c) the character of largely open and undeveloped landscapes between and within settlements will not be eroded or have their setting harmed; The landscape character of any build should compliment the area by it’s design.

SP15	Green & blue infrastructure	SUPPORT	I am very happy and agree that the Authority will work with other partners and adjoining authorities to develop green/blue infrastructure Why is providing SANG mitigation in the National Park even being mentioned let alone being considered I agree that SANG for development outside the park is not appropriate.
DP16	Open Space	SUPPORT	The 2nd sentence should be reworded to remove the bit about surplus to requirements. In the Copythorne Parish Design Statement, it is stated that green open spaces are not generally open to the public. How would DP16 (Open Space) apply to the site allocation for 55 dwellings? But as worded it is a little strange - section a) How on earth can open space be surplus to requirements in a national park? Given all the other worthy policies and support for the environment and wellbeing detailed in the rest of the plan, how would the open space apply to the allocation for 55 dwellings off Winsor Road?
DP17	Recreational horse keeping	SUPPORT	In terms of detrimental impact on the landscape is horse riding and keeping given higher priority than, say connected walking/cycle routes between villages and settlements? If not, how would this be demonstrated? What permission would be being sought for this policy to be considered?
DP18	Field shelters and stables	SUPPORT	-----
DP19	Maneges	SUPPORT	-----
SP20	Coastal Development	SUPPORT	-----
SP21	Coastal Change Management Area	SUPPORT	Reinforcing sea defences is a high priority

SP22	Tranquillity and Dark Skies	SUPPORT	Reducing the impacts of light pollution on the 'dark skies' of the National Park and control of development to prevent artificial lighting from eroding rural darkness and tranquillity is very important, especially when a reasonably large development is built in the middle of a rural village. Although it is acknowledged in 6.59 that pollutants can harm human health, there is no mention in 6.60 of mitigation with respect to reducing harm to human health. Eg vehicle emissions, wood burners etc. SP22—There is a high emphasis on Light pollution in this policy. The tranquillity map in the landscape policy documents appears to show least tranquil areas (after high population areas) flank roads is traffic pollution. Is there anything in the Plan to mitigate against this? However, it seems inconceivable that new developments will be able to adhere to this policy. Light pollution is a serious concern, Vehicles with stronger head lamps plus high watts on building using more electricity.
SP23	The historic and built environment	SUPPORT	I am very happy that adaptations that reduce carbon emissions will be supported where this would not harm the significance of the heritage asset or its setting. I agree with the reuse of historic buildings and seeing carbon emission reduction being addressed in the plan. The "whole building approach" when adapting for climate change is very sensible. I agree with the re-using of historic buildings and brownfield sites
DP24	Heritage	SUPPORT	I am thankful that Copythorne now has a Parish Design Statement. Sentence (b) should be changed from resisted to not allowed, Sentence (d) should add reference to consulting Historic England This policy gives a realistic way forward to conserve our historic assets. It aligns with national planning policy as outline in 7.13. 7.16 what is the update for the next conservation specific management plan? Does this involve Parish Councils? Many old buildings have been demolished in the past, fine example recently the demolition of the Fawley Power Station chimney in 2021
DP25	Local Distinctness	SUPPORT	How is this policy applied when only part of a village is defined? Fully support 7.26. In settlements bordering SSSIs this can be more difficult to manage. But how is this balanced against developments outlined in section 8 which do exactly what this policy is seeking to guard against? Relevant to new developments; extensions; and outbuildings.
DP26	Design Principles	SUPPORT	Support 7.28, this talks about new development, does that include outbuildings and extensions? Good checklist in 7.30.

DP27	Residential character of defined villages	SUPPORT	With regard to the proposed “Cadnam-Bartley” Defined Village we would appreciate more understanding as to why the boundaries have been drawn where they have, in particular the gaps between settlements. Please can there be clarity of what it means in terms of development for properties that sit within a Defined Village. To preserve residential character, reference to be made to Supplementary Design Guides (i.e. Neighbourhood Plans and Village/Parish Design Statements where they exist). Not all of the Defined Village of Cadnam/Bartley is actually in the villages some is in Winsor and some is in Coppythorne. This will be important for the transition of parts of Cadnam-Bartley to Defined village. 7.34 Good to see reference to the open spaces and gaps when characterising Defined Villages. 7.35 How would appropriate development density be applied to Cadnam-Bartley when significant parts in the Defined village are Ribbon development?
SP28	New residential development in the National Park	AGAINST (as currently presented – see comments)	Against this policy as worded. The National Park open and green spaces should be sacrosanct, there should be only new developments on proper brownfield sites, meaning SP34 and maybe SP33 and SP35 would fall into this category. The supporting housing need information indicates that there is expected to be a reduction of population within the park, but a shift in household make-up. So having identified a problem, rather than exploring imaginative solutions, the answer has been decided that building is the best solution. There seems to be a narrative (driven top down) that building has to happen in the park whatever, is there any evidence of local communities demanding new developments on green/open spaces in their community? I support point e) housing for commoners and agricultural and forestry workers. The output of the housing needs analysis has some very accurate numbers, but the inputs don't seem so much so. Who is determining local housing needs and how? Has the redevelopment of unoccupied properties in disrepair been considered? I would like to see a development of small bungalows for the elderly in our parish rather than housing aimed at the younger generation. This would allow older residents to be able to downsize but stay in the Parish. There needs to be the number of homes added to (d) rural exception sites. The reduction from the 4,940 new dwellings down to 950 is welcome to maintain the constraints within the National Park. Will neighbouring authorities be taking on this shortfall in housing need in their allocations? To continue to nibble building within the National Park. There will not be a park left.

SP29	Specialist housing for older people (Use Class C2)	SUPPORT	This needs to have numbers of older people added otherwise it is completely open ended. I/m concerned that over time the third sentence as worded could lead to homes being occupied by younger people. Supported, as if done properly and well will help to address the shift in household make-up, alleviating the need for the volume of new developments There should be specialist housing for the older generation.
SP30	The size of new dwellings	SUPPORT	It needs to explicitly state that this applies to homes in the defined villages as well. I agree this will give a more balanced mix of housing and be less intrusive on land Mixed sized buildings
SP31	Land at Whartons Lane, Ashurst (existing allocation)	NEUTRAL	Remove the target of 50% affordable and make it a requirement. Should not be developed as an open space/green site Already underway
SP32	Land at Ashurst Hospital (existing allocation)	NEUTRAL	8.30 note: possible covenant to prevent dog or cat ownership; is this enforceable? Already allocated
SP33	Land at Knellers Lane, Ashurst	NEUTRAL	Remove target for 50% affordable and make it 50% 8.32 Good to see an emphasis on improved cycle/pedestrian links. Should not be developed as an open space/green site
SP34	Land at the former Lyndhurst Park Hotel (existing allocation)	NEUTRAL	8.37. good to see that traffic congestion is noted but no mention of the associated pollution for residents, businesses and tourists. I agree with e) for a transport assessment with respect to Air Quality Management. The need for a local connection is supported. Already underway, like the design
SP35	Land at Calpe Avenue, Lyndhurst	NEUTRAL	There appears to be enough provision for C2 housing in Lyndhurst already As is an existing developed site and supports SP29
SP36	Land south of Church Lane, Sway	NEUTRAL	I am pleased to see a recognised need for proper sewage provision Good to see 8.42 off road pedestrian link supported in the plan. Should not be developed as an open space/green site
SP37	Land to west of Brighton Road, Sway	NEUTRAL	Yet more C2 provision Should not be developed as currently an open space/green site

SP38	Land to west of Winsor Road, Bartley	AGAINST (as currently presented, due to the number of concerns of both members and residents)	Bartley school is a Junior School, not a Primary School. The Parish has a separate infant school in Copythorne. This at first glance seems to mirror the Whartons Lane (SP31) site? Hence where is the need? And, it's not in Bartley, it's in Winsor. The main concern from residents at the drop were 1. Worried about inadequate sewage infrastructure 2. Worried about increased traffic along by the school. 3. Residents who had adult children living with them currently were not aware of the eligibility criteria to go on the NFDC housing register. Should not be developed as an open space/green site. Any need for housing could more than be accommodated by development already scheduled for Bartley and within a short distance in the Calmore/Totton area (that have more amenities and better transport links) Deep concern re traffic flow, already congested with moving traffic and parked vehicles from residents living in Winsor Road. Concerns about the drainage/sewer infrastructure. Dangerous crossing in/out of school by foot or vehicle. A mix of properties by height and size would be beneficial (including accessible designs to some properties to aid "downsizing"). Some of the other proposed "Site Allocation" policies have a site-specific reference to open spaces. We would like to see similar for this site as well and would want to work with any proposed developer on what that might look like (play area; orchard planting; pond (might help with drainage?); allotments; possible parking accessible for school drop off/collection) Given the justified concerns of residents relating to drainage (both foul and surface water) within the local area, we would want to see a requirement for these matters to be included in a site-specific requirement. Surface water drainage should be by the use of green (nature based) SuDs rather than grey SuDs where possible. As per Policy SP7 c) with Points 5.17 and 5.18 also of note. Whilst it is pleasing to see site-specific requirement b), it is strongly felt that this should be expanded to consider in detail the overall impact of circa 110 vehicles (avg. 2 per dwelling) on traffic issues in a wider area than just the ingress/egress point and proximity to Bartley Junior School. Concerns have been raised by residents that this development will make the village feel less rural.
SP39	Land to the south of Hamptworth Road, Landford	NEUTRAL	At first glance the rest of the area is pre-dominantly ribbon development along existing roads, any departure from this requires careful consideration.
SP40	Land to the east of The Ridge, Redlynch	NEUTRAL	At first glance, this will need much more research before agreeing to any planning proposal. Site is currently an open space/green site

SP41	Affordable housing within the defined villages and allocated sites	AGAINST (as currently presented – see comments)	This seems to have been written with allowing developers scope for providing less than 50% affordable. Also, not sure about the last but one sentence about the mix of rented v shared ownership. What happened to the bit about being for local people? Against as worded currently. The evidence for affordable housing isn't clear, in the New Forest Housing Needs Assessment section 2, paragraph 2.30 it states that 'Despite the level of need being high, it is not considered that this points to any requirement for the local planning authorities to increase their respective Local Plan housing requirements due to affordable needs'. Further clarification regarding the apparent dichotomy is required please Also the 50% figure appears to be driven by limit of acceptance of financial impact of provision of affordable housing that a developer is willing to bear. Again are there other ways of addressing affordable accommodation needs rather than just building. Losing so much agricultural and grazing land already in rural areas.
SP42	Rural exception sites	SUPPORT	I support this policy but feel that it was not upheld when considering the New Inn Road development as Bartley does not have access to local transport Yes to being in perpetuity. Agree with 100% affordable housing. Should a limit on development size be detailed? Only building on brownfield sites though
DP43	New Forest Commoners' dwellings	SUPPORT	-----
DP44	New dwellings for estate, agricultural and forestry workers	SUPPORT	-----
DP45	Removal of agricultural occupancy conditions	SUPPORT	Could dwellings considered in this policy not be used to support DP44?
SP46	Self and custom house building	SUPPORT	-----
DP47	Land at Forest View, Landford for gypsies and travellers.	NEUTRAL	---

DP48	Gypsies, travellers and travelling showpeople	SUPPORT	The “local connection” requirement should be looked at stringently for any occupancy.
DP49	Replacement dwellings	SUPPORT	It does not make clear the floor space rules for homes inside Defined Villages Can DP49 and DP50 be applied at the same time? If not. What is the criteria for separating them. Interesting to see the definitions of floorspace for original and proposed extensions, conservatories and outbuildings in 8.92 DP50 shouldn’t be allowed as a reason to construct a replacement dwelling 30% larger than an original as seems to be the case currently. If it is allowed it should be stated in DP49 that a replacement dwelling can be 30% larger than the original.
DP50	Extensions to buildings	SUPPORT	It does not make clear if the 30% rule applies inside a Defined Village. Can DP49 and DP50 be applied at the same time? If not. What is the criteria for separating them. Interesting to see the definitions of floorspace for original and proposed extensions, conservatories and outbuildings in 8.92 DP50 shouldn’t be allowed as a reason to construct a replacement dwelling 30% larger than an original as seems to be the case currently. If it is allowed it should be stated in DP49 that a replacement dwelling can be 30% larger than the original.
DP51	Outbuildings	SUPPORT	Guidelines on how “subservient” is defined would be helpful. “Clearly subservient is too open ended.
SP52	Local community facilities	SUPPORT	Within reason
SP53	Maintaining and improving Business Floorspace	SUPPORT	9.17 - I agree with not encouraging general warehousing for the reasons mentioned. 9.19 - I support retaining existing employment sites. Good to see the issue of parking and traffic addressed directly. If correct procedure followed
DP54	Redevelopment and extensions to existing employment buildings	SUPPORT	This is supported but it needs to be mentioned that there is always the danger of “chicken houses2 becoming workshops, becoming offices, becoming bungalows”. I believe it is important to retain employment in communities. But depends on type of business

SP55	The land-based economy	SUPPORT	Paragraph a (ii) contradicts Policy SP42 which releases back up grazing land for Affordable Housing 9.22 - I support the direction of travel for the Farming in Protected Landscapes programme. I support the emphasis on land management linked to the National Parks main aims. Affordable housing for Commoners is an important aspect to achieve this. Depending on type of trade
DP56	New agricultural and forestry related development	SUPPORT	Especially support the consideration of the building or structure size. Depends on the size
DP57	Re-use of farm buildings	SUPPORT	Good to see that the National Park is looking after the commoners. Support the emphasis on commoners having priority for buildings If it helps the farmer.
DP58	Loss of local retail facilities	SUPPORT	-----
DP59	Retail development outside of the defined settlement boundaries	SUPPORT	Good to see support for our local village shops and farm shops.
SP60	Sustainable tourism development	SUPPORT	This is broadly supported but wherever possible attention needs to be paid to linking up local transport services. How do “Airbnb” type properties fit into this policy?
DP61	Holiday parks and campsites	SUPPORT	I support the relocation of campsites within the National Park to less sensitive areas. Fully restoring the existing sites to an appropriate New Forest landscape is essential. 9.49 and 9.50 I support both the Article 4 Directions for pop up and temporary campsites. If a reasonable size

SP62	Telecomms and Digital infrastructure	SUPPORT	To reduce impact, can masts be painted green or be camouflaged with greenery? This Policy needs to be strengthened for G5 telecom masts which by their very nature are particularly intrusive and will cause visual harm if not carefully sited and disguised to be as unobtrusive as possible. I support the provision of IT infrastructure and the conditions imposed to minimise visual, tranquillity and character impacts. The condition to remove the equipment once redundant is important. 9.57 - I agree the Solent Freeport Fawley Waterside tax site is the obvious site to meet this need. IT infrastructure is always important.
DP63	Transport Infrastructure	NEUTRAL (Still needs some refining)	Should this policy also include horse riding? Horse riding is a very important mode of transport in the National Park This is far too “woolly”, and needs to spell out minimum acceptable levels of transport that must be provided for new developments 10.3 support the New Forest Tour 10.8 what kind of traffic management initiatives would be considered? Not sure how this is going to work in rural settlements like Copythorne. Minimal lighting, narrow lanes, lack of footpaths /cycle lanes affects the safety of active travel. Heavy traffic to Lyndhurst and Romsey. There are no public transport links for health appointments or linking to railway stations. There is a limited (two weekdays only) bus service suitable for food shopping or visiting family in Totton.
SP64	Sustainable transport and access	SUPPORT	I support this policy but currently feel that Copythorne Parish is being overlooked. We have virtually no public transport, no cycle routes and roads and pavements are in poor state of repair. From what I heard at the recent NFNPA Community Transport Summit, at the moment the National Park is removing rather than enhancing cycling and walking infrastructure! This is a great wish list but in reality, when some of these have been proposed they conflict greatly with the National Park’s strategic objectives. Can the Design statement help overcome this? 10.21 - I am led to believe the LCWIP has removed the link from Copythorne to Lyndhurst. Does that conflict with SP63? 10.22 - The “utility network” appears to have very low priority in the last presentation I saw on the LCWIP. Especially more joined up no-vehicle routes. We need a link between Copythorne and Lyndhurst.