



Sway Parish Council

Parish Clerk: David Edwards

clerk@sway-pc.gov.uk

Phone 01590 718116

(Usual office opening hours 10-11:30am
Monday, Wednesday and Thursday)

Jubilee Field
Station Road
Sway
Lymington
SO41 6

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To: Policy Team,
New Forest National Park Authority,
Lymington Town Hall,
Avenue Road,
Lymington, SO41 9ZG

Sent by E-mail attachment to: policy@newforestnpa.gov.uk

Dear Sir/Madam,

Sway Parish Council's response to the NFNPA Local Plan Consultation

With reference to the NFNPA Local Plan Consultation, this is Sway Parish Council's response which has been approved by the Parish Council's Planning and Transport Committee.

Section 1: Introduction

Sway Civil Parish comprises one tenth of the population of the New Forest National Park. Sway Civil Parish is entirely within the borders of the National Park and includes one of four defined villages within the National Park. Sway Parish Council has taken an active interest in the Local Plan proposals and through the Sway Parish Council website (at the time of sending this is the number 1 issue on the home page, and featured in the News list), and through Sway News and the Sway Parish Council Planning & Transport Committee has sought to canvas the opinions of all Sway residents. Sway has produced a Village Design Statement which is adopted as a Supplementary Planning Document by the NFNPA.

Over the last few years Sway Parish Council has surveyed every household in the Civil Parish on questions of Affordable Housing and priorities for the Parish Council. A number of Sway Parish Councillors attended the helpful consultation meeting in Sway (02 Nov 2016) and listened to the thoughts of local residents. In previous NFNPA consultations Sway has been pleased to see that our responses have been considered, and we trust the same will be true for this response.

Section 2: General remarks.

There is much to commend and support in the draft Local Plan. In particular Sway applauds, supports and would want to see the following remain in the new Local Plan:

- ✓ The renaming of the "Core Strategy and Development Management Policies DPD" document as a 'Local Plan' is helpful.
- ✓ The proposal not to modify the boundaries of the defined villages (save perhaps for Clay Hill in Lyndhurst – where we assume Lyndhurst Parish Council will advise). This will allow better control over development at allocated sites.

- ✓ The proposal to limit all new dwellings to a maximum of 100m². This will address the startling reduction in the number of smaller (and hence not quite so unaffordable) dwellings in Sway, as extensions are added and current Policy DP11 rules are circumvented. Sway would suggest that the maximum 100m² rule should extend to replacement dwellings unless there is good reason to make an exception.
- ✓ An outline of the Sanford Principle which is at the heart of the order of importance in the NFNPA's strapline: "*Protect, Enjoy, Prosper*".
- ✓ The importance of Green Infrastructure and Open Space (5.18 – 5.28 including Policy 8) – Sway residents regard this as one of the key factors making Sway a special place to live, and we wish to ensure that Stanford Rise Public Open Space is highlighted for protection as a Local Green Space (as Sway VDS page 11 and a recent consultations with residents)
- ✓ Climate change and renewable energy – concerns to Sway residents.
- ✓ Historic and Built Environment – would proposed Policy 15 have saved the fine Sway Victorian Old School?
- ✓ Local distinctiveness: particularly support to maintain grass verges (6.14) and bringing forward the limit on anything bringing a 'gradual suburbanising effect' within the Park – Sway residents are keen to keep the identity and feel of a New Forest Village. Also new Policy 17 e supporting key visual features or other valued components of the landscape – again features that Sway residents value.
- ✓ The bringing forward of the VDSs is heartening, and Sway trust that NFNPA planning will continue to respect Parish Councils whose VDSs are adopted as Supplementary Planning Documents. Sway Planning and Transport Committee were encouraged to hear that when the NFNPA Planning Development Control Committee recently toured Sway they recognised the wisdom of Sway's advice on developments such as Gablemead in Manchester Road.
- ✓ Policy 34 limiting garden-grabbing and overdevelopment is in line with the wishes of Sway residents.
- ✓ Support for commoning and back-up grazing is vital to maintain both the adjacent open forest (inside the SPA / perambulation) as well as the nature of the grassland of the outer Parish (beyond the defined village).
- ✓ The specific recognition of an aging populations is welcome (31.4% of Sway's population is 65 or older; the corresponding figure for the whole of the NFDC area is 27.2%). Development, design and infrastructure should all reflect this – and this is supported by the provision of more small dwellings suitable for downsizers as well as for younger buyers; and we feel that a good mix of all ages is important to maintain a vibrant community. We suggest the consideration of limiting some less expensive housing so that it can only be bought by those under say 35 years of age.
- ✓ Replacement Dwellings (Policy 35). This will contribute to the avoidance of suburbanisation in the defined village and the circumvention of current Policy DP11 elsewhere.
- ✓ Access (Policy 54) to ease traffic congestion, encourage use of public transport and joined-up networks of public Rights of Way may make a small contribution to easing parking issues in Sway.
- ✓ The emphasis on Affordable Housing (Policy 27) is something that Sway residents support (as evidenced in our parish-wide survey results).

There are then a number of areas where there may be advantages as well as disadvantages and where perhaps improvements could be made to the new Local Plan:

- ? Given NPPF para 115 et al., Sway would strongly support the NFNPA seeking to reduce the target for housing as noted in paragraph 7.10 of the draft Local Plan document.

- ? Replacement dwellings (policy 35) Sway do not support the alternative suggestion (below 7.71) which would weaken this policy.
- ? Policy 54: Sway recognises the support but wonder what actions could be taken. The Rights of Way in Sway (which is adjacent to the open forest) are poorly interconnected – could HCC Rights of Way be engaged to help this.
- ? Speeding is a major issue for Sway residents and following the decision in the Isle of Wight to reduce speed limits to 20mph in villages, Sway suggest this should be encouraged in the Park area and suggest the NFNPA engage with Hampshire Highways on this issue. There is a further suggestion of a 20mph speed limit across the entire civil parish, except for the B3055. This would be inexpensive and would improve the environment for safer walking and cycling.
- ? Sway sees a number of ‘pop-up’ campsites which are only temporary and often not permitted, but by the time enforcement are able to act the season has passed and they return the following year. Perhaps Policy 46 could be amended to discourage this?
- ? Experiences with the current equivalent of a Local Plan (Core Strategy and Development Management Policies DPD) mean that sections were superseded by the NPPF and/or modified by the Planning Practice Guidance. Whilst no-one can predict the future, if the new Local Plan is proposed to cover the next 20 years Sway would urge more thought on making the new Local Plan more future-proof. Sway would prefer to discourage ‘Starter Homes’ because these are not affordable, will not remain as starter home in perpetuity and it is not likely that starter homes could be built within the proposed limit of £250K being 80% of the full market price.
- ? Surface water disposal is becoming an increasing problem in Sway due to the local geology and geomorphology – exacerbated by the increasing use of impermeable surfaces, increased roof areas and heavier bouts of rainfall due to climate change. Sway suggest that some stronger references be made to ease this issue where possible.
- ? Generally car parking provision for new and replacement dwellings is woefully short of reality. We must recognise that although we might want to discourage car use, local public transport provision is pathetic so dwellings will inevitable have multiple cars – more than are catered for in Annex 2. Car parking should also be a more prominent consideration when extensions are proposed – such permissions will often increase the size of a household that can be accommodated – and hence more vehicles.
- ? Sway consider that there could be more emphasis on development of brownfield sites, as well as any site where permission has already been granted but has not yet been completed.
- ? Sway are concerned that developers will be able to circumvent the 50% affordable housing target of policy 27 by that policy being ‘informed by a viability assessment’ and fear that what the policy giveth the footnote taketh away. Sway would prefer the asterisk and footnote be removed. We note that this policy seems to be aimed at development “within the defined village boundaries”, and we would want to be sure that this would also apply to any new adjacent allocated sites. Furthermore Sway would support the alternative option (page 58) of seeking affordable housing on all development sites.
- ? On Policy 28 Sway would **not** want to see the Alternative Option which would provide a loop-hole to get around the provision of affordable housing.
- ? Sway feel that Policy 38 - Infrastructure Provision and Developer Contributions is vital because Sway has either poor or fully utilised infrastructure and any development must be matched by improvements to roads, public transport, schools, NHS provision, recreation, nature conservation and similar.
- ? Sway probably has the least retail provision (per capita) of any of the defined villages – and indeed compared to many other New Forest Villages. Whilst Sway Residents are always supportive in word the Parish Council recognise that the wallet and purse does not always follow the intent. If it could be maintained in the current permitted development envelope

Sway would prefer something along the lines of alternative option A on page 74 – to protect the current meagre retail stock in Sway.

- ? Sway supports agricultural and forestry development as in Policy 49 but would want to ensure that any development for agricultural or forestry purposes remains so in perpetuity wherever possible.

There are then just a few areas where Sway disagrees with the draft Local Plan or would suggest significant changes or additions:

- ✘ Policy 37 Outbuildings is insufficient to prevent the circumvention of Policy 36 (equivalent to existing policy DP11). In Sway outer parish in particular we are seeing a stream of giant outbuildings being proposed when this is clearly just to get around the 30% limit on floorspace increase from extensions. We strongly suggest Policy 37 needs to be beefed up – perhaps with an indication or examples of the sort and size of outbuildings that may be acceptable and a clear statement that outbuilding applications which are submitted to circumvent Policy 36 will not be granted. Home-working can quite easily be carried on in the home (the clue is in the wording) – there is no need for vast additional garages with offices above.
- ✘ We lament the disappearance of the 400m zone – given things like the ‘Our Past – Our Future’ push to protect the fringes of the open forest this is a retrograde step. Sway suggest the re-introduction of a policy of greater sensitivity to green corridors, habitats, wildlife – flora and fauna – in a 400m zone adjacent to the SPA.
- ✘ Sway sees a significant flouting of existing policies which goes un-punished. Over-building and unauthorised change of use and similar are often allowed to continue. For this reason whilst fully recognising the NFNPA Enforcement Policy Sway suggest a strengthening of the provision and encourage an Enforcement statement of intent be included in the new Local Plan
- ✘ Sway would encourage the maintenance of Agricultural Ties, which should be more carefully monitored, by checking every property with an agricultural tie every two or three years – with an appropriate addition to Policy 32. We would further suggest that any recent permissions granted for large outbuildings for incidental use might also be checked every couple of years to prevent their automatic conversion to residential use on the basis of 10 years flouting of the condition.
- ✘ Boundary treatment: fences, walls, ditches and verges are considered important in Sway in maintaining a New Forest Village so we would urge consideration of a section on these items – perhaps outlining the preferences – perhaps with reference to the Design Guide SPD, summarising the national rules (maximum 1m on highway, 2m otherwise), and with a specific new policy on boundaries.

Section 3: Sway (7.27 to 7.29 and Policy 23 on pages 51 and 52)

- Sway residents are seriously concerned about the overstretched infrastructure of our civil parish and would want to see improvements in areas such as sewage, drainage, roads, public transport, schools, NHS, utilities, parking and similar. Many extensions and outbuildings, as well as some larger replacement dwellings and new dwellings have all added to the strain on infrastructure, without any significant improvements. So before any significant further development takes place Sway would want to see the NFNPA seek assurances on infrastructure improvements.
- Transport flow along the B3055: The NFDC Local Plan Review shows that there is already considerable commuter traffic flow to the Southampton area. As many of the NFDC proposed housing areas are in New Milton, Hordle and Ashley we fear the B3055 through Sway becoming even busier than it is at present. If any significant new development came to the south of Church Lane that would inevitably add to the problems.

- Sway residents were disappointed to find in the public consultation that the initial plans are for far more additional housing in Sway than in any other part of the Park – including Sway having as many new houses proposed as all three other defined villages added together. Residents have pointed out that if (as Policy 18 a) there are 225 such houses to be built in an area with a population of some 35,000 people, then Sway Civil Parish with a population of some 3,500 people (10% of the total) might anticipate that around 23 new houses (10% of 225) would need to be built within Sway Civil Parish.

Specifically on Policy 23 – Land south of Church Lane, Sway:

- Sway residents generally recognise the need for more affordable housing in Sway, but locals - in Church Lane in particular - are voicing significant issues both in principal and in detail. The responses of such locals will be individually sent in; but these include:
 - Ninety houses is far too intense a development for Sway to sustain in this area.
 - As 7.27 notes, the Sway VDS recognises the area south of Church Lane as a valued open space and a key view in the village.
 - Parking around the School and traffic congestion in Church Lane are both serious local issues, and exacerbated by the recent redevelopment of the Social Club and Old School sites and the addition of a 'forest school' to St Luke's School. Development of the land south of Church Lane would need to address both of those problems.
 - Drainage and sewerage are poor in that area and would need to be addressed prior to any development – especially at the lower, saturated eastern end of the plot.
 - Part of this site towards the eastern end of the plot, is within the 400m sensitive zone.
 - Any development should be primarily of true Affordable Housing: affordable in perpetuity, and not just small houses or starter homes, and should be integrated into any development at this site.
 - As noted with great clarity in the Sway VDS (see for instance pages 13 and 14) part of the character of Sway is a mix of sizes, designs and styles, and most residents would want to see that in any development, rather than a lot of similar-looking housing.
 - There are substantial trees and hedges of amenity value – some trees covered by TPOs; and as many of these as possible should be retained – they screen much of the centre of the village from the B3055.
 - Sway Planning and Transport Committee feel that there are some strategic considerations that neither the NFNPA nor Sway Planning and Transport Committee have communicated clearly to Sway Residents and we suggest these should be more widely disseminated:
 - The fact is that the NFNPA need to identify sites for development is driven by government diktat. If the NFNPA do not come up with sites then the danger is that the Planning Inspectorate will determine where development should take place and impose planning permissions on the NFNPA.
 - The Call for Sites was not clearly understood by many residents. It needs to be made clearer that Sway Parish Council, the NFNPA and HARA did walk the areas to the south and west of the defined village and suggest sites, but that we cannot force landowners to sell their land – so only areas put forward in the Call for Sites can be considered.
 - Some residents seemed to think that this is a fait accompli and there already exists somewhere detailed plans for this development.

Section 4: Trivial minor points

4.16 The second sentence does not make sense

5.5 Isn't the Broads now a National Park and smaller?

7.86 Line 1: 'that that'

9.3 Beaulieu Road is not really a railway station! Sway has no bus service to speak of.

9.4 So the New Forest Tour does not serve Sway – why not.

Yours faithfully,

David Edwards

Parish Clerk and Responsible Financial Officer