Ringwood Town Council

Ringwood Gateway, The Furlong, Ringwood, Hampshire BH24 1AT Tel: 01425 473883 www.ringwood.gov.uk

SUMMONS

Dear Member

21st April 2022

You are hereby summoned to attend a meeting of the Town Council at the Forest Suite, Ringwood Gateway on 27th April 2022 at 7.00pm.

Mr C Wilkins Town Clerk

AGENDA

- 1. PUBLIC PARTICIPATION There will be an opportunity for public participation for a period of up to 15 minutes at the start of the meeting
- 2. To receive Apologies for Absence
- 3. To receive Declarations of Interest
- 4. To receive a report from Ringwood Police
- 5. To approve as a correct record the Minutes of the meeting on 30th March 2022
- 6. To receive Minutes of Committees and approve recommendations contained therein: Recreation, Leisure & Open Spaces Planning, Town & Environment (Recommendation: P/5992 Land at Moortown Lane 21/11723-separate agenda item) Policy & Finance DATE:- 1st & 13th April 2022 DATE:- 22nd April 2022

7. LAND AT MOORTOWN LANE 21/11723

To consider a recommendation from the Planning, Town and Environment Committee to approve the draft response to planning application 21/11723 for submission to NFDC (*Report A*) (*P*/5992 refers)

8. GRANT AID AWARDS

To note Grant Aid award to Poulner Junior School of £2,000 to help fund the development of an outdoor learning area

9. SPORTS DEVELOPMENT PROJECT AT LONG LANE

To receive a report from Cllr Loose (the Council's representative on the Steering Group) or Cllr Briers (deputy) on project developments

- **10.** To receive such communications as the Town Mayor may desire to lay before the Council (Councillors are reminded that no decision taking may take place as a result of this item)
- **11.** To Receive Reports from Ringwood Town Councillors (Councillors are reminded that no decision taking may take place as a result of this item)
- **12.** To receive Reports from County and District Councillors (Councillors are reminded that no decision taking may take place as a result of this item)
- 13. Forthcoming Meetings to note the following dates:

Recreation, Leisure & Open Spaces	s 7.00pm	Wednesday 4 th May 2022
Planning, Town & Environment	10.00am	Friday 6 th May 2022
Annual Town Assembly	7.00pm	Wednesday 11 th May 2022
Policy & Finance	7.00pm	Wednesday 18th May 2022
Annual Council Meeting	7.00pm	Wednesday 25 th May 2022

If you would like further information on any of the agenda items, please contact Mr Chris Wilkins, Town Clerk, on 01425 484720 or <u>chris.wilkins@ringwood.gov.uk</u>

Council Members:

Chairman: Cllr Tony Ring, Town Mayor Vice-Chairman: Cllr Philip Day, Deputy Mayor Cllr Andy Briers Cllr Gareth Deboos Cllr Hilary Edge Cllr Rae Frederick Cllr John Haywood Cllr Jeremy Heron Cllr Peter Kelleher Cllr Darren Loose Cllr Gloria O'Reilly Cllr Steve Rippon-Swaine Cllr Derek Scott Cllr Glenys Turner

Officers:

Chris Wilkins, Town Clerk Jo Hurd, Deputy Town Clerk

CREST NICHOLSON "HYBRID" PLANNING APPLICATION IN RESPECT OF LAND OFF MOORTOWN LANE, RINGWOOD

(DRAFT) RINGWOOD TOWN COUNCIL RESPONSE V.3

<u>Summary</u>

This is Ringwood Town Council's response to planning application 21/11723

The application for outline planning consent concerns part only of Strategic Site 13 as identified in New Forest District Council's Adopted Local Plan Part 1 and the detailed planning consent concerns part only of the site included within the area encompassed by the outline application.

In this response, RTC address a number of matters of "detail" but that we have chosen to do so should not detract from its fundamental objection to the current proposals.

Introduction

During the process of adoption of the Local Plan Part 1, RTC made both written and oral representations to the Public Inquiry with regard to what was originally known as "Site P" but is now referred to as "Strategic Site 13".

In very brief summary, RTC was opposed to the removal of Site 13 from the Green Belt and concerned as to the extent of the proposed development and matters relating to infrastructure.

Nevertheless, the site was included within the housing allocation on the basis it could provide at least 480 dwellings, employment land of about 2 hectares, the provision of land for a minimum of 15 full size allotment plots and (south of Moortown Lane in the Green Belt) the provision of natural recreational greenspace and public open space (including outdoor sports facilities) and 2 hectares of land to be reserved for a primary school.

It should be noted that the current applicant neither owns nor has any control over parts of "Site 13" and this is highly relevant in that it means that the applicant is simply not in a position to deliver a number of strategic/policy objectives of the Local Plan insofar as it relates to this site. Further detail as to the relevant issues are dealt with below.

The mere fact that the land the subject of the applications is included as a strategic site within the adopted Local Plan does not mean that any planning consent should be automatically granted (even in outline) – the applicant needs to demonstrate that its proposals include appropriate infrastructure and in the view of RTC, the current application manifestly fails in that regard.

Further, the proposals either entirely or inadequately fail to address a series of other matters of concerns which are outlined below.

"<u>Caveats</u>"

At the time of preparing this response, formal responses from a number of consultees were awaited, including in particular from (but not limited) to the Highway and Education authorities. RTC must reserve its right to comment further in the light of further responses from other statutory consultees (see also further below).

lssues

In this section, RTC simply sets out the matters of concern – more detailed comments follow in the sections below and the appendices.

Principle of Development Housing Mix and Type Design Considerations – Site layout Transport (including walking and cycling strategies) – <u>please note that this</u> <u>issue is fundamental.</u> Nature Conservation and Ecology Public Open Spaces Flooding, Drainage, Water Supply and Foul Water Residential Amenity Sustainability Gravel extraction

Principle of Development

Whilst the Local Plan identified the land included within the application as appropriate for housing (and employment) development, this was on the basis that appropriate infrastructure be included in any proposal.

The application fails to comply with this policy requirement on a number of matters:

No community facility is proposed within the site and no proposal has been made regarding any "off-site" provision. RTC is not in a position to suggest any "off-site" provision and looks to the applicant to make appropriate proposals.

The proposal does not include any provision for a primary school (see further below regarding transport in particular).

RTC does not consider it appropriate that any land currently used for formal recreational activity should be re-designated as a school. If (and the Education Authority's response is awaited) it is necessary or appropriate to designate land for the construction of a Primary school, it is the view of RTC that this <u>must</u> be provided within the site in the applicant's ownership, excluding any land that is currently used as formal recreational space (i.e. the football pitches south of Moortown Lane).

The application also fails to take into account that Ringwood currently does not meet national criteria regarding formal recreational space. The proposal as it stands would reduce the number of football pitches currently available and makes no provision for either replacing that same nor increasing the provision as would be required should this proposed development be approved. The proposal taken as a whole does not provide sufficient informal green space to meet policy requirements and its design (see further below) is also problematic.

Housing Mix and Types

It is noted that the outline scheme provides 50% affordable housing but the detailed planning application does not. This is not acceptable.

Furthermore, the mix of housing and types proposed is contrary to NFDC policy;

Housing Mix – Application Planning Statement section 6.75 correctly reproduces the NFDC Local Plan (2020) Policy HOU1 for the required mix of housing sizes, for each of the sectors "Affordable Housing to Rent", "Affordable Housing to buy" and "Market Housing".

However, the presentation made does not achieve these proportions. Para 6.75 lists overall proportions but without reference to different housing sectors, and moreover, are listed as "indicative" - hardly a commitment!

Moreover, the open market housing mix only proposes 20% of 1-2 bedroom sizes, compared with Policy HOU1 which requires 30-40%. This failure to match the requirement would mean that, of the 168 dwellings proposed in phase 1, there would be a shortage of some 25 dwellings likely to be more affordable to people - particularly those with Ringwood connections - to start a home. There is very little in this application that benefits the well documented housing needs of our local community, and the diminution in this developers plans for fewer smaller, less expensive housing is unacceptable.

2. **Housing Types**. Although the proportion of subsidised Affordable Housing in the proposal of 47% is nearer the Policy requirement of 50%, the recently commissioned Ringwood Housing Needs Assessment (attached) suggests the split of types should be 50% Affordable to Rent/50% Affordable to Buy, rather than Policy guidance of 70%/30%. This Needs Assessment summarises the position as follows:-

"Accordingly, within the Affordable Housing that comes forward in future we have recommended a split of 50% routes to home ownership and 50% Affordable Housing for rent. Within the 50% affordable ownership, there could also be a split of 25% First Homes, 20% Shared Ownership and 5% Rent to Buy. Importantly, this split within the affordable home ownership is compliant within current government guidelines, such as First Homes and Rent to Buy. This recommendation should be interpreted flexibly as there is an argument for a higher weighting on affordable rented products due to uncertainty about future rates of turnover, the need to meet a share of the District's needs, and the fact that much affordable home ownership is only affordable to above average earners in Ringwood."

We recommend this proposed 50/50 mix of Affordable tenures as being more suitable for the subsidised housing sector on this SS13 site.

Regard should also be had to the work undertaken by RTC's Neighbourhood Planning Teams regarding housing need in Ringwood (Appendix A). In summary, the application is unacceptable because it does not:

Provide sufficient open market housing for one and two bedroom apartments and flats (Indeed, there appear to be no proposals for such housing within the detailed application);

Provide for larger affordable housing such as 4 bedroom houses;

RTC would in any event ask for a s.106 Agreement to ensure that all manner of affordable housing is provided <u>before</u> open market housing is offered for sale/occupied.

Design Considerations – Site layout

RTC have significant reservations about the design (particularly in relation to the detailed application).

The detailed application seems to us to be very inward looking and quite inappropriate for a development on the fringes of the Town, bordering as it does to Green Belt land and in very close proximity to the National Park – there would be no (or very limited) views from within the development to the open areas.

The density of proposed housing in the detailed application (40 per hectare) is significantly greater than what has been approved (and now built) at Beaumont Park (Linden Homes at 32-33) and the proposed development at the "Taylor Wimpey" site (also referred to as "Hightown", "Nouale Lane" and strategic site 14) at 35 per hectare.

Further, the detailed application provides little (if any) opportunity for soft landscaping and one is left with the impression that the "side streets" will probably be obstructed by parked cars (see also further below under "sustainability".

There is at present a large tree and copse in the middle of the site which is a nesting site for a pair of breeding buzzards. It is understood that that this tree would be felled which would be regrettable to say the least – we suggest that a TPO be made to prevent this.

In the view of RTC, the proposals to not adequately provide for preservations of existing hedgerows nor the provision of additional tree and other planting.

The "green spaces" are remote from the proposed housing and few if any are incorporated within the detailed application and there is what might be described as a "hard edge" around the housing site with no "soft transition" to the open areas. This is particularly the case along the western boundary – see further below regarding the water main and overhead electric power lines.

Further, the proposals do not take into account the impact of the proposed development on the National Park, particularly but not limited to light pollution.

Under the NNPF, a proposal that is not well designed should be refused consent. An appropriate tool should be used to assess how good the design is.

In this context, RTC make reference to a "Building for a Healthy Life" ("BfHL") assessment undertaken by one of the teams involved in drafting a Neighbourhood Plan for Ringwood which indicated the proposed development is not well designed. A copy of the assessment is at Appendix B. Noting that use of appropriate tools like BfHL is required by the NPPF [133], we would be interested to know which ones are being used by NFDC to assess Ringwood's allocated sites.

<u>Transport</u>

The Local Plan (and earlier incarnations) envisaged a route from the A31 (west bound), through what is now the "Taylor Wimpey/Nouale Lane" site, then onto Crow Lane and then through this site to Christchurch Road, either via Moortown Lane or, more importantly through the Forest Park (or as we know it the "Wellworthy site").

The applicants are simply not in a position to deliver the policy objectives because no application has come forward from Hampshire County Council regarding the plot of land in the North West corner of site 13 and the access onto Crow Lane depends on the ownership of land that is also outside the applicant's control (and would most probably require the demolition of one or more of the properties along Crow Lane itself).

It follows that the applications <u>must</u> be considered on basis that the sole access into and from the site will be from Moortown Lane. This alone does not achieve the policy objectives of the Local Plan.

Whilst this response has been prepared without sight of a response from HCC Highways, RTC comment as follows:

The proposal does not meet the policy objective of a link from the A31 to Christchurch Road nor does it achieve a sustainable cycling and walking strategy.

The traffic assessment is based on surveys that are out of date, having been conducted either during lockdowns or at times when significant numbers were working from home.

The proposals for the junction between Moortown Lane and Christchurch Road and along the western end of Moortown Lane are unsatisfactory. There is simply not enough room to allow for a footpath and 2/3 lanes of traffic without encroaching onto privately owned land. Further, the houses on either side of Moortown Lane at this point (particularly that on the northern side) occupy elevated positions and it would be necessary to provide some form of retaining wall that would dominate the street scene in what is at present an entry point into the countryside. Such a construction would be incongruous and unsightly.

The applicant has acknowledged that the development will have consequential effects on the route into Ringwood Town centre and to the A31 and suggests that three of the four roundabouts could be improved to ease traffic flow and congestion. However, no details have been provided and the Town Council is aware that previous investigations by the Highway authority have demonstrated that there is no practical scope to improve the three roundabouts at the junction with Castleman Way, at the War Memorial and the main town roundabout junction with Southampton Road.

The applicants also propose a pedestrian crossing point at the Moortown junction, across Christchurch Road. It is ludicrous to think that pedestrians will cross the road at that point simply to avoid walking across the forecourt of the Texaco filling station; further, the footpaths along Christchurch Road are not continuous and the one footpath that passes opposite the brewery site is very narrow with no scope to be widened.

The transport assessment also assumes that the majority of school children living in the development would walk or cycle to school. Unless the applicants can deliver a walking/cycling route across Crow Arch Lane and into and across the Beaumont Park estate (Linden Homes) (over and onto land that is not within their ownership), the only access will be via Moortown Lane. Elsewhere, it is proposed that primary and junior school children would be educated at Poulner schools (notwithstanding that this site currently falls outside the catchment area!) – a distance of over 2 miles away, on the other side of the A31. It is frankly ludicrous to suggest that parents will do anything other than drive their children to school (there are no buses). Not only will that significantly increase traffic movements at dropping off and picking up times but it will also exacerbate an already serious issue of parking around the Poulner Schools.

Nature Conservation and Ecology

The proposed ANRG does not meet minimum policy requirements and does not accord with the relevant SPD in terms of functionality as there is a road crossing through the middle of it.

Whilst it is conceded that the scheme proposes a net gain in bio diversity (largely because the land is currently high quality arable land), it is of concern that the mature trees in the middle of the site is to be felled and that elements of hedgerow will be lost. Further, deer are regularly seen to be grazing on the land and will be displaced.

The site is just over 100m from the Avon Valley SSSI and there is extensive evidence that the gardens of the houses in-between are permeable to wildlife. The site layout would close this corridor and be against consultee advice from Wessex Water (due to water pipes) and the presence of overhead electricity cables, both of which require access for maintenance. More information on this and concerns about the BNG and phosphate calculations used by the applicant is contained in Appendix C.

The site layout with its streets effectively lined with housing provides little or no opportunity for landscaping and planting within the built area. If each property has a soak-away in its rear garden as proposed, this too would limit the opportunities that future residents might have for tree planting on their properties.

There is also serious concern regarding a lack of any detailed phosphate mitigation – NFDC does not have its own scheme and the applicants have provided no detail of what mitigation they might be able to achieve (nor where).

Public Open Spaces

RTC questions whether the scheme provides sufficient informal space but is also extremely concerned that the scheme relies on utilisation of existing formal recreational space. By national standards, Ringwood is already deficient in terms of formal recreational space and that will remain the case even after the proposed redevelopment of the Football club.

Far from providing additional formal space, the scheme envisages the loss of two existing playing pitches. It is submitted that the applicant should provide both additional formal and informal recreation space within the land it owns/controls north of Moortown Lane and does not rely on any of the land to the south of the lane.

Flooding, Drainage, Water Supply and Foul Water

The scheme is deficient in that it suggests that each property should have its own soak away in rear gardens – this would severely limit the opportunity to plant trees in rear gardens.

No swells or SUDS are proposed and surface water from the roads is to be held in crates. This proposal is a lost opportunity to increase bio-diversity by the creation of ponds or small lakes.

The applicant also appears to be unaware that existing field drains flow through the listed building known as Moortown House – the existing flow has historically caused flooding in the formal garden of that property and surface water from roads finding its way into that drain for example is likely to be contaminated with oil, diesel and petrol.

Local residents have also raised concerns about water pressure in the existing mains serving other properties in the locality. No information has been provided regarding the provision of water supplies to the proposed development nor has any account apparently been taken of the effect that may have on existing properties, including those within Beaumont Park and along Crow Lane in particular.

No detail has been provided as to how the foul sewers from the site would connect to the existing foul sewer in Christchurch Road and RTC question whether that sewer has the capacity to cope with the additional demand this development would cause.

RTC also understands that the sewerage treatment plant in Hampshire Hatches is already at capacity (such that from time to time, untreated waste is discharged into the river Avon) and questions whether it is physically possible to increase capacity.

Another matter of concern is that some years ago, a flood relief drain was constructed in an attempt to alleviate the flooding that regularly occurs along Crow Lane. Whilst this drain has not yet been commissioned (recent investigations have been undertaken with a view to bringing it into operation), RTC question how it might be impacted by the proposed development.

Residential Amenity

RTC's principal concern here is the impact on existing residents along the western boundary of the site. Many of those properties lie significantly below the ground level of the site and as the proposal stands, would be substantially overlooked by new houses. The scheme envisages that the rear gardens of properties along the western boundaries would abut onto the existing boundaries of the existing properties. However, it is understood that there is a water main running along the western boundary along with electricity cables, vehicular access to which would be required at all times. Further, it is understood that the water utility company would require a "corridor" that is at least 10 metres wide along the route of the water main – the scheme does not provide for these requirements.

It is also noted that there appears to be no assessment of odour or noise.

The detailed layout also leads RTC to suppose that there will be substantial on-street (or worse, on pavement) parking once the houses are occupied.

It is acknowledged that it is a matter for the applicant to determine when to bring forward application but RTC is surprised that the current proposal is to develop that part of the site closest to Moortown Lane first. If that were to happen, it would mean that new residents on the estate would find that construction traffic for the remaining part would

have no option but to go through the middle of the new housing with all the noise and associated nuisance that would bring.

Sustainability

It is noted that the proposal is simply to construct properties to existing Building Regulation standard, even though Crest Nicholson confirmed to RTC that they intended to build to a higher standard and indeed, have done so elsewhere.

This scheme can hardly be described as innovative in that (for example) it does not provide for solar panels (and the orientation of many of the proposed houses would be sub-optimal in that regard); heating will be gas powered with no provision for heat pumps; no attempt is made to provide for grey water recycling and the build methods are traditional and carbon intensive.

More information on this is provided in Appendix D.

The lack of SUDS is also regrettable in terms of sustainability.

Gravel extraction

At the Public Inquiry into the Local Plan, it was asserted by those seeking to bring forward this site that gravel/mineral extraction would need to take place before the site was developed. Whilst RTC would not encourage such extraction on this site, not least because of the disruptive effect on local residents (noise and dust etc) it would be appreciated if further information could be provided.

Conclusion

The Town Council recognises that both nationally and locally, there is a housing shortage, particularly for younger people who find it difficult to the point of impossibility to step on to the "housing ladder".

However, there are so many issues with the present applications, both outline and detailed that we urge that the application be refused and the applicant be in effect invited to go back to the drawing board.

Ringwood Town Council Ringwood Gateway The Furlong Ringwood BH24 1AT

Appendix A – Ringwood Housing Needs Assessment January 2022 Appendix B – Building for a Healthy Life Assessment Appendix C – Environmental Impact Assessment Appendix D – Energy and Sustainability Statement