

CABINET - 5 OCTOBER 2005

PORTFOLIO: ECONOMY AND PLANNING

"WHERE SHALL WE LIVE?" – DISTRICT HOUSEBUILDING TARGETS FOR SOUTH EAST PLAN

1. INTRODUCTION

- 1.1 The South East Plan will set out a strategic planning framework for the region up to 2026. It is being prepared by the South East England Regional Assembly (SEERA) but the final Plan will be issued by the Government after a Public Examination into SEERA's Plan. Before the draft Plan is submitted to the Government, there are two rounds of public consultation:
 - Consultation on a <u>broad regional strategy</u>, including sub-regional proposals and subregional housing targets. This took place earlier this year and Cabinet agreed a response to SEERA on 6th April (Report and minute attached as Appendix 1 to this report). Following that consultation SEERA submitted Part One of the Plan, which includes subregional and "rest of County" housing targets, to the Government.
 - The current consultation (which runs until 21st October) is on proposed <u>District housing targets</u> for 2006 2026. The consultation document, called "Where shall we live?", has been prepared by Hampshire County Council and the Partnership for Urban South Hampshire (PUSH). All Councillors have been supplied with a copy of the consultation document. Following the consultation, Hampshire County Council and PUSH aim to advise SEERA of District housing targets to be included in the complete draft South East Plan. SEERA intends to submit this to the Government in March 2006 and the Public Examination will be late 2006/early 2007.
- 1.2 New Forest District is split between:
 - "South Hampshire" (which include Totton and the Waterside east of the National Park), and
 - "Central Hampshire and the New Forest" (which includes the rest of the District).
- 1.3 This report recommends a response to Hampshire County Council and PUSH on the "Where shall we live?" consultation document.

2. GENERAL COMMENTS ON "WHERE SHALL WE LIVE"

2.1 The consultation document gives little information on the impacts of the options other than indicating in general terms where the major development could take place to meet the District totals presented in the options. Government advice requires that options are formulated with an integrated Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA). The consultation document recognises this legal requirement (see page 2, bottom of column one) but at this stage no SA/SEA has been done. The document states (page 2) that the Hampshire authorities will take into account the appraisal results before submitting the District level housing figures to SEERA. However, that will be after this consultation period. It is essential therefore that the appraisal is done thoroughly and properly, and that its findings are properly taken into account. At this stage it has not been demonstrated that the options presented for public comment are the most sustainable options.

2.2 So far as New Forest District is concerned, development anywhere in the District would be close to the National Park and major development is likely to have an impact on the National Park. The Defra Guidance Note (2005) on "Duties on relevant authorities to have regard to the purposes of National Parks...." states very clearly that: where proposals outside a National Park may have an impact on a National Park, the relevant authorities will be expected to have regard to the purposes of the National Park and to assess the impact of the proposals on the National Park. The guidance states that:

"Relevant authorities are expected to be able to demonstrate that they have fulfilled these duties. Where their decisions may affect National Parks, they (the relevant authorities) should be able to clearly show how they have considered the purposes of these areas in their decision making. This might be done in the following ways:

- relevant authorities should consider undertaking and making publicly available an assessment of the impact on National Parks, the Broads or AONBs of any policy, plan, programme or project which is likely to affect land within these areas.
- relevant authorities should ensure that decisions affecting these areas are properly considered and recorded in high level policy documents and public statements;"
- 2.3 These requirements have not been met in formulating the options put forward for public consultation., The main concern for this Council (and this is also understood to be the main concern of the National Park Authority) is about the options proposed for the Totton and Waterside area of New Forest District, which lies directly adjacent to the National Park, and where 2 out of the 3 proposed options imply major new greenfield development. For the rest of New Forest District, which is included in the "Central Hampshire and New Forest" area, none of the options would require major new greenfield development beyond that already identified in the Local Plan First Alteration.

3. COMMENTS ON SECTIONS OF "WHERE SHALL WE LIVE?"

Regional Context - core strategy (page 2)

3.1 The emphasis in the Consultation Document on the need to ensure that adequate infrastructure and services are provided in association with any development is to be very strongly supported. There must be specific Government assurances on this and the rate of development must be tailored to the provision of infrastructure and services.

"Options for South Hampshire" section (pages 4 to 6)

The vision

- 3.2 The focus on urban regeneration and renaissance of the two cities and other main urban areas is to be supported. Careful consideration must be given to ensure that the proposals for new greenfield development do not undermine these fundamental aims.
- 3.3 The PUSH strategy, which was agreed by SEERA and included in the Part One submission of the South East Plan, proposes 4,000 new dwellings a year in South Hampshire, i.e. 80,000 dwellings 2006-2026 primarily to meet the housing needs associated with an increased economic growth rate. This rate of housing development is a significant increase on recent rates.

Overall spatial strategy and Strategic Development Areas

- 3.4 While priority is given to urban regeneration and development of urban brownfield sites, which are estimated to provide for some 49,000 dwellings 2006-2026, there is an assessed remaining requirement for some 31,000 dwellings on greenfield sites.
- 3.5 The intention is to concentrate most of this new development in 2 new Strategic Development Areas (SDAs), one east of Hedge End (up to 9,000 dwellings) associated primarily with Southampton, and the other north of Fareham (up to 10,000 dwellings) and associated primarily with Portsmouth. The rest of the new development is to be provided through new urban extensions.
- 3.6 Officers consider that the principle should be supported of new Strategic Development Areas, with the necessary new infrastructure and services, to provide for the major part of new greenfield development.

Brownfield development within urban areas

The figures presented in the consultation document assume a fixed amount of "existing commitments plus urban capacity" of 49,000 dwellings 2006 – 2026. However, the text on page 6 refers to ranges of figures for each of the 2 cities, with the lower figures based on "confident" assumptions and the higher figures taking more account of potential sites. These ranges are presented in the Appendix. Your officers are seeking further information from the County Council, but understand is that the rates of brownfield development assumed 2016-2021 and 2021-2026 may be lower than recent rates, despite the strategy emphasis on urban regeneration. More work needs to be done on this aspect to assess whether a properly urban focussed strategy could be adopted throughout the period with a corresponding reduction in the need for greenfield urban extensions. The statement (page 6) that any increases in urban capacity would lead to corresponding reductions in the need for Greenfield urban extensions is very strongly to be supported.

Urban extensions

- 3.8 The SDAs will not be developed until after 2016 and a significant amount of development is proposed on "new urban extensions" primarily in the 2011-2016 period but continuing through to 2021/26. Urban extensions are proposed in New Forest, Test Valley, Winchester, Havant and East Hampshire Districts with the other Districts excluded from the need to provide for any urban extensions. Of the three proposed options, two options propose significant new urban extension in the narrow strip of Totton and the Waterside east of the National Park:
 - Option 1 1,000 dwellings on new greenfield sites
 - Option 2 500 dwellings on new greenfield sites
 - Option 3 Zero dwellings on new greenfield sites
- 3.9 It is difficult to see any clear logic, in terms of sustainability issues, for the statements made in the second paragraph of the "urban extensions" section that "no urban extensions are proposed in Southampton, Portsmouth or Gosport as that would mean building on the few remaining areas of undeveloped land"; and that no urban extensions are proposed in Fareham and Eastleigh Districts because they have SDAs. The real test should be whether urban extensions and building on undeveloped land in these Districts would be more or less sustainable than building on undeveloped land elsewhere and this has not been tested. More work needs to be done on this issue as part of the capacity/appraisal work.
- 3.10 The options in the Consultation Document assume that the fixed amount of 12,500 new homes need to be provided on greenfields outside the SDAs. This figure needs to be reassessed in the light of further work on urban capacity and on size of the SDAs and should not be regarded as a fixed amount at this stage (see paragraph 3.8 above).

- 3.11 The list of bullet points on page 11 of the consultation document states that the scope for urban extensions in New Forest District is limited and that the potential impact on the New Forest National Park is an important consideration. The latter consideration is in fact a legal requirement under s62 of the Environment Act (1995). However, there is no evidence to show that these considerations have been taken into account in drawing up the options. The figures in the options appear without any explanation of how they have been derived or of what their impacts will be.
- 3.12 A proper sustainability appraisal needs to take account of the following considerations:
 - The impact on the New Forest National Park
 - The extent of existing recognised constraints in the Totton/Waterside area including
 the Strategic Gaps (which are important open areas between the settlements and need
 to be protected under either Strategic Gap or Local Gap designation); and the Hazard
 Zone around the Fawley oil refinery.
- 3.13 NFDC officers consider that a proper sustainability assessment would show Options 1 and 2 to have unacceptable disadvantages in terms of "sustainability". This should have been taken into account in formulating the options.
- 3.14 In the light of the above comments, Option 3 is the only one that officers would recommend that NFDC should support i.e. zero dwellings on new greenfield sites in the Totton and Waterside part of New Forest District.

"Options for Central Hampshire and New Forest" section

- 3.15 800 new dwellings are proposed a year in Central Hampshire and the New Forest, i.e. 16,000 dwellings 2006-2026. This is a significant reduction on recent rates of development. It is estimated that some 14,000 dwellings will be provided through existing commitments and continuing development in the built-up areas. This leaves a new greenfield requirement for some 2,000 dwellings.
- 3.16 Five options are proposed for the new greenfield development. The first four include development at Winchester, Andover and Whitehill/Bordon without any new greenfield development in New Forest District. The fifth option proposes that the development be shared among the above and some other main towns. Only this fifth option includes new greenfield development (100 new dwellings) in New Forest District.
- 3.17 The difference between the options as they affect New Forest District is therefore only 100 dwellings. The adopted New Forest District Local Plan First Alteration already identifies a reserve site for 150 dwellings at Ringwood. Officers consider that any of the proposed options for "Central Hampshire and the New Forest" could be provided for over the period 2006-2026 and that there are no grounds from the perspective of New Forest District for any strong preference between the five options.

4. FINANCIAL IMPLICATIONS

4.1 None arising from this report.

5. ENVIRONMENTAL IMPLICATIONS

5.1 For the South Hampshire area, Options 1 and 2 would have unacceptable environmental implications for the reasons set out in this report. This is taken into account in the recommendations below, which support only Option 3.

5.2 For the Central Hampshire and New Forest area, the environmental implications of the different options are only marginal as they affect this District.

6. CRIME AND DISORDER IMPLICATIONS

6.1 None

7. CONSULTATION

- 7.1 A wide range of bodies are being sent the "Where shall we live" consultation document by the County Council. A special edition of the "Hampshire Now" newspaper is also being widely distributed. All of the consultees are being asked to respond by 21st October so it is not possible to report on the views of other parties and the general public to this Cabinet meeting.
- 7.2 The Economy & Planning Review Panel considered the document at its meeting on 21 September. After a detailed discussion the Panel unanimously supported the conclusions set out in the report, in particular paragraphs 3.12 3.17. In respect of paragraph 3.1, the Panel's key concern was the consequential impact of extra dwellings on the local infrastructure, in particular on transportation. The Panel felt strongly that this factor should be given proper consideration by the Government when setting house building targets for the area, and that proper measures should be put in place to address those concerns.

8. PORTFOLIO HOLDER COMMENTS

8.1 The Economy & Planning Portfolio Holder, Cllr Jeremy Heron, has commented as follows:

"I am both surprised and disappointed at the proposals set out in Options 1 & 2 as neither can be supported by the work that has been undertaken in the last 18 months. All workshops have clearly shown that Greenfield development in this area is unsustainable. I see consultation on such proposals to have no planning merit and a cynical attempt to balance numbers."

9. RECOMMENDATION

- 9.1 That in response to the "Where shall we live?" consultation document, New Forest District Council:
 - 1. Supports the principles that:
 - (i) Further development should only take place where adequate infrastructure and services are ensured hand-in-hand with the development
 - (ii) Development in South Hampshire should be focussed on urban regeneration and renaissance of the two cities and other main urban areas
 - (iii) The major part of any new greenfield development should be concentrated in new Strategic Development Areas, provided with the necessary infrastructure and services.
 - Considers that further work needs to be done with regard to the scope for development in the main urban areas over the whole plan period, with a view to reducing the amount of development that needs to be provided for through greenfield urban extensions.
 - 3. Considers that it is absolutely vital that there is a proper and full Sustainability Appraisal/Strategic Environmental Assessment of the options before any decision is taken. This must take into account in particular the impact of development proposals on the New Forest National Park, in accordance with the

requirements of the 1995 Environment Act and the 2005 guidance published by Defra. It must also take account of the accepted constraints in New Forest District outside the National Park.

- 4. Would only support Option 3 for the "South Hampshire area", and objects strongly to Options 1 and 2 on the basis that these options would require unsustainable major new greenfield development in the Totton and Waterside area, and that this would be likely to have an unacceptable impact on the adjacent New Forest National Park and also on the area outside the National Park if proper account is taken of local designations and constraints.
- 5. Has no strong preference between the options for the "Central Hampshire and New Forest area".

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Background Papers:

"Where shall we live?"
HCC and PUSH September 2005

PORTFOLIO: ECONOMY AND PLANNING

SOUTH EAST PLAN – RESPONSE TO CONSULTATION

1. PURPOSE OF REPORT

1.1 This report recommends a response to SEERA on the South East Plan Public Consultation Draft.

2. BACKGROUND

- 2.1 The South East Plan is being prepared by SEERA (the South East England Regional Assembly). This is an important matter. The South East Plan will form part of the statutory development plan, providing the strategic context for the Local Development Frameworks to be prepared by this Council and the National Park Authority.
- 2.2 SEERA has produced a set of documents for public consultation called "A Clear Vision for the South East The South East Plan". SEERA is inviting comments by 15th April. The documents have been distributed as follows:
 - all of the documents are on the SEERA South East Plan web-site: southeast-ra.gov.uk/southeastplan/index.html
 - all of the documents are available in the NFDC Members' Room
 - all of the documents have been made available in NFDC Local Offices and in libraries
 - a summary leaflet and questionnaire ("Your Shout") is being posted by SEERA to every household in the region.
- 2.3 A copy of the South East Plan Executive Summary accompanies this report.
- 2.4 This is the first part of a two-part consultation. At present, the proposals are presented at the broad regional and sub-regional levels. There are 9 defined "sub-regional strategy areas" in the Plan but these do not cover all of the region. The remaining parts of the region are included in "rest of County" areas. The eastern part of New Forest District (Totton and the Waterside) lies within the South Hampshire sub-region. The rest of New Forest District is within the "Rest of Hampshire" area.
- 2.5 Later on this year, there will be a second consultation on more detailed proposals including District housing requirements.
- 2.6 The programme for the work from now on is being considered at the SEERA Planning Committee on 23rd March. Cabinet will be updated on this but it is understood that the programme is likely to include SEERA making a decision in June on the overall growth levels for each sub-region and "rest of County" area. It is likely that SEERA will ask the local authorities in each sub-region/rest of County area to produce options for the distribution of housing and other development to meet these total requirements. The local authorities will be expected to complete this work by September, including having carried out public consultation in July/August. This is a very tight timetable.

- 2.7 The draft South East Plan was considered at meetings of:
 - The Economy and Planning Panel on 16th March
 - The New Forest District Local Strategic Partnership on 16th March
 - New Forest District Parish and Town Councils on 17th March.
- 2.8 The main comments raised by the Panel and LSP are summarised in Section 7 of this report.

3. COMMENTS ON THE DRAFT SOUTH EAST PLAN

3.1 This report does not attempt to summarise the draft South East Plan. The Executive Summary (circulated with this report) already does that. A full officer presentation is being given to the Economy and Planning Panel meeting on 16th March. This report focuses on the sections of the draft South East Plan that will have particular implications for New Forest District and recommends a response to SEERA.

<u>The Core Strategy – including regional spatial options for housing</u> <u>development</u> (Section C)

- 3.2 The Core Strategy sets out proposals for the scale of development and the broad regional pattern of growth. Table C2 from the South East Plan, included in this report, shows the 6 options proposed for distributing housing development around the region. These options are illustrated on maps included on pages 4 to 6 of the Executive Summary.
- 3.3 The options are based on 3 different regional growth levels:
 - 25,500 dwellings a year based on the past 5 year build rate
 - 28,000 dwellings a year approximately the current planned build rate
 - 32,000 dwellings a year an increase above the current planned build rate
- 3.4 For each growth rate there are 2 options, based on
 - continuation of existing policy, or
 - "sharper focus" i.e. concentrate more development in the defined sub-regions and reduce the proportion in the rest of the counties.
- 3.5 Hence there are 6 spatial options presented at this stage as set out in Table C2. These include a range of housing development levels in each of the "South Hampshire" sub-region and in the "Rest of Hampshire". There is no further information available at this stage about the implications for individual Districts. That will be covered in Stage 2 of the work.
- 3.6 Issues regarding South Hampshire, including the housing options, are dealt with later in this report (paragraphs 3.19 to 3.25). The housing options for the "Rest of Hampshire" are considered immediately below.

TABLE C2

Summary of Spatial Options

	Continuat	Continuation of Existing Policy			Sharper Focus	
	Sp	Spatial Option i			Spatial Option ii	
Area	25,500	28,000	32,000	25,500	28,000	32,000
Kent Thames Gateway	2,900	2,900	2,900	2,900	2,900	2,900
Milton Keynes and Aylesbury Vale	3,300	3,300	3,300	3,300	3,300	3,300
East Kent and Ashford	2,400	2,500	2,800	2,600	2,800	3,100
Central Oxfordshire	1,300	1,500	1,700	1,400	1,600	1.900
Gatwick Area	006	1,100	1,300	1,300	1,500	008'1
London Fringe	1,500	1,700	2,100	2,000	2,300	2,800
South Hampshire	2,800	3,200	3,800	2,900	3,300	4,000
Sussex Coast	2,700	3,000	3,600	2,300	2,600	3,100
Western Corridor and Blackwater Valley	3,500	4,000	4,800	4,300	4,900	2,900
SubTotal	21,300	23,200	26,300	23,000	25,200	28,800
Rest of Berkshire	100	100	100	001	100	100
Rest of Buckinghamshire	200	200	300	200	300	300
Rest of East Sussex	300	400	200	400	400	200
Rest of Hampshire	1,200	1,400	1,600	700	800	1,000
Rest of Kent	700	800	1,000	200	200	200
Rest of Oxfordshire	200	800	006	300	300	400
Rest of Surrey	200	200	300	200	200	200
Rest of West Sussex	400	400	200	001	100	001
Isle of Wight	400	200	909	400	400	200
SubTotal	4,200	4,800	5,700	2,500	2,800	3,200
GRAND TOTAL	25,500	28,000	32,000	25,500	28,000	32,000

- Notes

 These are indicative figures only.

 Figures are rounded to the nearest 100. Rounded figures may not sum.

Proposals for "Rest of Hampshire" (in Sections C)

- 3.7 All of New Forest District outside the South Hampshire sub-region is included within the one defined area of "Rest of Hampshire". In addition to most of New Forest District, this includes Central Hampshire i.e. large parts of Test Valley, Winchester, East Hampshire and a small part of Basingstoke District.
- 3.8 The draft South East Plan includes a range of housing options for the "Rest of Hampshire" varying from 700 dwellings a year up to 1,600 dwellings a year (i.e. 14,000 to 32,000 dwellings over the 2006 to 2026 period). At the moment there is no proposed breakdown to individual Districts. This will be part of the "Stage Two" work. Neither are there any specific proposals for other land uses included at this stage.

Comments on proposals for "Rest of Hampshire" and spatial options

- 3.9 For the "rest of County" areas, the draft South East Plan at this stage is over-focused on housing development numbers. It does not provide an integrated spatial strategy that would form a proper basis for preparing Local Development Frameworks.
- 3.10 The housing figures included in the range of options for the rest of Hampshire are the highest for any of the counties in the region (see Table C2). While Hampshire is a large County, about half of this area will be constrained by the (existing) New Forest and (proposed) South Downs National Parks. There is a large element of "trend planning" in the figures proposed for the counties outside the defined sub-regions. Accordingly the range of housing figures proposed for Hampshire includes large figures because Hampshire has had a high development rate in the past.
- 3.11 At this stage it is not possible to say what the implications would be for New Forest District. However it is recommended that the following comments be made to SEERA:
 - (i) New Forest District Council is concerned about the high figures (in comparison with other counties) proposed for the "Rest of Hampshire" in the "continuation of existing policy" options. It is essential that the implications of the National Parks are taken into account. Provisional work indicates that it would not be possible to accommodate the higher options without severe adverse consequences. So far as Table C2 relates to Hampshire, the "Sharper Focus" options should be preferred over the "Continuation of existing policy" options.
 - (ii) Before any final decision is made on the overall growth levels for the "rest of Hampshire", and on the distribution of this growth between the various Districts, it is essential that a proper and integrated Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) is carried out. It has to be satisfactorily demonstrated that the growth proposed can be accommodated without serious adverse impacts on the environment and quality of life in this area.
 - (iii) Particular account must be taken of any adverse impact of development on the New Forest National Park, taking into account the factors set out in Policy C1 (page 146) and its associated text.
 - (iv) New Forest District Council fully supports the retention of the Green Belt to the south and west of the New Forest (Policy CC9, page 54)
- 3.12 Based on provisional technical work carried out by the planning officers within New Forest and Central Hampshire, it is estimated that the bottom of the range of housing options proposed for the "Rest of Hampshire" is too low and would not provide enough scope to meet the area's affordable housing needs. An annual build rate of more than about 1,000 dwellings a year, however, would be difficult to accept environmentally. It is understood that

a Council Leaders meeting on 24th March will be recommended to support a housebuilding rate of 1,000 per annum in Central Hampshire and the New Forest in the individual Council responses to the draft South East Plan. An update will be given to the Cabinet meeting.

"The Regional Policy Framework" (Section D)

- 3.13 This part of the Plan includes many general policies [cross-cutting policies, economy and tourism, housing, communications and transport, sustainable natural resource management, countryside and landscape management, management of the built and historic environment, town centres and social, cultural and health dimensions].
 - Comments on the Regional Policy Framework (including affordable housing)
- 3.14 In general, the policies set out in these parts of the Plan can be supported, subject to the following comments:
 - (i) It is difficult to comment meaningfully given that the draft Plan is so incomplete at the moment – and especially as it does not include District-level proposals at this stage. Any comments made at this stage must therefore be subject to reconsideration when the whole Plan is available for comment later in the year.
 - (ii) The Regional Plan needs to demonstrate more how it can have a real impact. There is no point in it just repeating national policy. At present, the implementation plan is not very well developed. Before the Regional Plan is finalized and submitted, the policies, Implementation Plan, and Monitoring and Indicators need to be better developed to demonstrate the impact on the region that the Plan aims to have and to show how this will happen. Given the abolition of County Structure Plans, the South East Plan (including its sub-regional strategies) must properly fulfill the role of providing a strategic framework for the preparation of Local Development Frameworks.
 - (iii) The new development proposed in the region must be accompanied by the provision of adequate new infrastructure. The provision of this must be assured before a commitment is made to development.
 - (iv) The objectives of a step change in affordable housing delivery, providing the right type of housing and making better use of the existing stock (Section D3 paragraph 1.2) are to be very strongly supported. However, these are not fully reflected in the policies as proposed.
 - (v) The split between different types of affordable housing (Section D3, Policy H4) should be determined at the sub-regional or local levels in the light of local circumstances.
 - (vi) The statement in Section D3, paragraph 5.5 with regard to affordable housing contributions is to be strongly supported -i.e. "in many parts of the region the scale of need, combined with the predominance of small to medium housing sites, means that site thresholds may need to be set below the levels in Government guidance".
 - (vii) The principle the Plan establishes that affordable housing needs should be met where they arise (page 79) is strongly supported. However implementation needs to take account of environmental constraints.
 - (viii) The inclusion in Section D4: "Transport and Communication" of the following major "schemes" in the South Hampshire and Isle of Wight Investment framework 2006 and 2016 is welcomed:

- M27 various junction improvements including J3-4
- Rail improvements east of Southampton along the coast
- Workplace parking / congestion charging investigation.
- Plus consideration of output from A34 corridor study.
- (ix) The document (Section D5) acknowledges that the South East is the driest area in the country, but does not appear to attempt to reconcile this with the levels and distribution of development proposed. This should have been fundamental to sustainability appraisal of development options.
- (x) Section D7: "Management of the Built and Historic Environment" needs to be updated to refer to the requirements in PPG1 for well-designed development that improves the character and quality of an area.
- (xi) The town centre policies (Section D8) imply too great a concentration of facilities in the larger town centres (none of which are in New Forest District) and are potentially damaging to smaller town centres.

Minerals and Waste policies (in Section D5)

3.15 The draft South East Plan includes the Minerals and Waste policies from the deposited SEERA Minerals and Waste Strategies (2004). NFDC made representations on policies W18, M3 and M5 when originally published, as debated at the Examination in Public (EiP) held in October 2004. These concerned issues relating to the location of waste recycling facilities in the Green Belt, AONBs and National Parks, and the proposed aggregates apportionment for the New Forest. In the draft South East Plan these policies are repeated in their original form although it states that they are liable to change. The District Council maintains its objections to these policies as they stand, but supports the conclusions of the EiP Panel which generally supported NFDC's representations (EiP Panel Report December 2004). We would expect that the necessary amendments are included in the revisions to South East Plan following this consultation.

The New Forest (Section D6, paragraphs 1.5 to 1.7 and Policy C1)

3.16 The draft South East Plan includes this policy:

POLICY C1: THE NEW FOREST NATIONAL PARK

The Plan gives the highest priority to protecting and conserving land within the New Forest National Park. The local planning authority and other partners should also develop supportive sustainable land management policies, both inside the National Park and within the zone of 'New Forest commoning activity', including protection of grazing land outside the National Park which is needed to support National Park purposes.

3.17 The related text (Section D6, paragraphs 1.5 to 1.7, pages 145-6) explains the situation with regard to National Park designation, refers to the Strategy for the New Forest (2003), summarises the key issues regarding the New Forest and states that the area should become "a model for sustainability". A tailor-made policy framework related to the special circumstances of the New Forest is advocated.

Comments on New Forest National Park section

3.18 Policy C1: The New Forest National Park and the related text (Section D6, paragraphs 1.5 to 1.7) is very strongly to be supported and must be retained in the Plan when it is submitted to the Government. The New Forest is the only National Park in the region (the South Downs may follow) and also includes the richest concentration of international nature conservation designations in the region. In this context it is perfectly appropriate for the Regional Plan to include a policy and text specifically relating to the New Forest. Policy C1 is needed to set the policy framework for further development plan work to be carried out in due course by the New Forest National Park Authority and the surrounding local authorities. The South East Plan would be failing to meet its duties if this policy was not included.

SOUTH HAMPSHIRE (Section E1)

- 3.19 This Council has been closely involved in the development of the South Hampshire subregional strategy through the "PUSH" (Partnership for Urban South Hampshire) group of local authorities. The Economy and Planning Portfolio Holder and various officers have been particularly involved.
- 3.20 The section of the draft South East Plan dealing with South Hampshire is based on following overall strategy submitted to SEERA by the PUSH Group.

POLICY SH1: OVERALL STRATEGY

Development in South Hampshire will be led by economic growth and urban regeneration. Portsmouth and Southampton will be dual focuses for investment and development as employment, retail, entertainment, higher education and cultural centres for the sub-region. The other towns will play a complementary role serving their more local areas. Investment and improvements in transport will reflect this, as will the location of sites for development. High density development will be encouraged in the city and town centres, around public transport hubs and at sustainable waterfront locations. The preferred spatial option is to be determined during development of the sub-regional strategy. The scale and pace of land release for development will be related to the rate of economic growth taking place across the sub-region and to the provision of new infrastructure.

3.21 In summary, the proposed strategy for South Hampshire is based on the following range of development:

	Lower Estimate	Upper Estimate
Economic growth rate	3% pa	3.5% pa
Land for employment	approx. 400 hectares	approx. 500 hectares
Total new housing	RPG plus 15% 79,000	RPG plus 20% 82,000
Accommodated through existing commitments and urban capacity	47,000 — 56,000	47,000 - 56,000
Additional housing required on greenfield sites	23,000 - 32,000	26,000 - 35,000

3.22 Members will see that new green-field sites for some 23,000 to 35,000 dwellings would be needed (for development by 2026) plus some 400 to 500 hectares of employment land (it is understood that recent work suggests that these figures may need to be increased). This new green-field housing development is additional to the estimated capacities of the existing urban areas to take more development (having regard to government advice on this issue).

3.23 There are going to be no easy options to accommodate this scale of development. The "Stage One" consultation does not include a preferred spatial option, but does say that "Strategic Development Areas will be allocated north of and in close proximity to the two cities" (Policy SH2, page 184). The spatial strategy will be worked up during "Stage Two" (i.e. by September).

Comments on the strategy for South Hampshire

- 3.24 It is understood that the PUSH Group as a whole intends to respond to the draft South East Plan and that the draft PUSH response will be considered at a meeting on 6th April (after the Cabinet meeting). At the time of writing this report, the proposed PUSH response is not available but an update will be given at the Cabinet meeting.
- 3.25 Cabinet is recommended to support the overall strategy for South Hampshire as set out in Policy SH1 subject to the following comments:
 - (i) It is essential (as is recognised by the PUSH group) that any growth in South Hampshire is matched by the necessary infrastructure and services, both to cater for the additional growth and to help resolve existing problems. This will require additional funding in a similar manner to the funding that is being provided to the already identified regional growth areas (Milton Keynes, Ashford, Thames Gateway).
 - (ii) New Forest District Council, on the basis of the evidence presented so far, would not support any growth levels for South Hampshire higher than the range proposed in the draft South East Plan.
 - (iii) Before any final decision is made on the overall growth levels for South Hampshire, and on the distribution of this growth between the various Districts, it is essential that a proper and integrated Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) is carried out. It has to be satisfactorily demonstrated that the growth proposed can be accommodated without serious adverse impacts on the environment and quality of life in the sub-region.
 - (iv) This SA/SEA must specifically include a full and detailed analysis of the impacts of the growth proposed in South Hampshire on the adjoining New Forest National Park and be able to satisfactorily show that any adverse impacts are avoided, having regard to the requirements set out in Policy C1: The New Forest National Park (see paragraph 3.16 above).
 - (v) It is essential that economic growth is accompanied by an increase in affordable housing supply. Without this, in-migration for employment, together with a probable increasing polarisation of high/low income levels, will place greater pressure on local housing markets which will disproportionately disadvantage those on lower incomes.

4. FINANCIAL IMPLICATIONS

4.1 No direct implications arising from this report. However, the South East Plan is likely to have important financial implications.

5. ENVIRONMENTAL IMPLICATIONS

5.1 These are a key issue in preparing the South East Plan and the associated sub-regional strategies. Full Sustainability Appraisals and Strategic Environmental Assessments will be required.

6. CRIME AND DISORDER IMPLICATIONS

6.1 No direct implications arising from this report. However, the South East Plan will deal with issues that have implications for crime and disorder.

7. MAIN COMMENTS MADE AT THE MEETINGS OF THE ECONOMY AND PLANNING REVIEW PANEL, and LOCAL STRATEGIC PARTNERSHIP.

- 7.1 The Economy and Planning Review Panel was presented with a summary of the recommendations in this report and generally supported the points made, with particular emphasis on the following points:
 - While the "sharper focus" option is preferred over the "continuation of past trends", it should be recognized within the South Hampshire sub-regional strategy that Totton and the Waterside are not appropriate locations for further major development, particularly because of the proximity to the New Forest;
 - The necessary infrastructure should precede further development;
 - There is concern about the possible loss of important existing Strategic Gaps within the District;
 - Some members expressed strong concern that the range of growth options proposed in the draft S E Plan is too high, and considered that Government policy should be directed to encouraging more growth outside the south east region;
 - There is concern about where the increased population would work if there is further growth, especially if the loss of employment sites continues;
 - The Panel expressed very strong support for the New Forest section and policy and for the recognition of the need to protect essential land around the National Park.
- 7.2 Members of the New Forest District Local Strategic Partnership, while not expressing any formal view, expressed views that:
 - The New Forest section and policy should be supported;
 - The relatively poor economic performance of South Hampshire is surprising;
 - Green Belt policy at the regional level should be looked at again, while recognizing the need to protect the Green Belt south and west of the New Forest from development;
 - Infrastructure should precede development and must be defined in the widest sense (e.g. including youth provision).

8. ECONOMY and PLANNING PORTFOLIO HOLDER COMMENTS

8.1 It is important that the South East Plan remains what it is purported to be, a strategy for the economic growth of the region and is not turned into an attempt to merely increase the number of houses being built.

- 8.2 As a District I hope that we would support our colleges in neighbouring towns and cities who wish to see this economic growth maximised and who consequently are prepared, once they are provided with adequate infrastructure, to accommodate an increase in housing numbers; however New Forest District should not become a place in which to locate those houses that neighbouring towns and cities believe they do not have the capacity for.
- 8.3 The Plan recognises not only the unique qualities on the New Forest National Park but also the importance that the surrounding area has in preserving the ability of the Park to function and it would appear that it accepts that both areas deserve protection. I trust that these laudable statements continue to be widely supported for this major cultural and environmental asset to the Region, even when the difficult decisions, on where development takes place, are being made.

6 APRIL 2005

132. DECLARATIONS OF INTEREST.

Cllr Kendal declared an interest in Minute Nos. 134 & 139 Cllrs Heron, Rickman and SS Wade declared interests in Minute No. 139 Cllr FR Harrison declared an interest in Minute No. 140

133. DRAFT SOUTH EAST PLAN - RESPONSE TO CONSULTATION (REPORT A).

The Cabinet considered the draft South East Plan, as published for consultation by the South East England Regional Assembly together with a proposed response.

Members noted a revised and extended timetable for the work.

The eastern part of New Forest District was in the defined South Hampshire sub-region. Most of the District was included in "central Hampshire and the New Forest". It was noted that a house building rate of 1,000 p.a in central Hampshire and the New Forest had been recommended by a meeting of relevant Council Leaders (or their substitutes). This tied in with "sharper focus" options in the draft S E Plan that proposed a decrease in the rate of development outside the defined sub regions but a corresponding increase in the rate of development in the defined sub-regions.

In terms of the Strategy for South Hampshire the Cabinet noted the proposed response from PUSH and was advised that this would be considered at a Partnership for Urban South Hampshire (PUSH) meeting later in the day. Members agreed there could be tensions developing between the Council's stance and the higher growth levels proposed in recent work by DTZ consultants commissioned by PUSH.

The Economy and Planning Portfolio Holder said that overall he was satisfied with the Council's response to the consultation document but would continue to evaluation the position as matters developed.

RESOLVED:

That the comments on the draft South East Plan as set out in Report A to the Cabinet and below be submitted to SEERA as this Council's comments on the draft South East Plan :

- (a) That the comments on the proposals for "Rest of Hampshire" and spatial options as detailed in paragraphs 3.9 to 3.12 be agreed;
- (b) That the comments on the proposals on the Regional Policy Framework (including affordable housing) as detailed in paragraph 3.14 be agreed;

Cabinet

6 APRIL 2005

- (c) That the Minerals and Waste policies as detailed in paragraph 3.15 be agreed;
- (d) That the comments on the New Forest National Park in paragraph 3.18 be agreed; and
- (e) That the Strategy for South Hampshire as detailed in paragraphs 3.24 to 3.25 be agreed.

134. MILFORD ON SEA - SEAFRONT PHASE B (REPORT B).

Cllr Kendal declared a personal interest as a local member. He did not consider his interest to be prejudicial. He remained at the meeting and took park in the discussion but abstained from voting.

In March 2004 the Cabinet agreed arrangements and funding for Phase A of the Seafront refurbishment. Members now considered proposals for a phase B of the project to complete the scheme.

Milford Parish Council had indicated that they wished to take over and maintain the proposed Under 5's play area and Members agreed that this needed to be formally recognised.

RECOMMENDED:

- (a) That the proposals for Phase B of the scheme to renovate Milford Seafront as detailed in Report B to the Cabinet be approved;
- (b) That the process for funding Phase B be approved;
- (c) That the provision of the under five's play area be subject to a formal Agreement with Milford Parish Council, which secures their interest in the long term tenure of the land and commitment to maintenance of the area; and
- (d) That the project management arrangements remain in place for the duration of the project and are used on an "as required" basis.

135. CRITICAL ORDINARY WATER COURSES (REPORT C).

All Critical Ordinary Watercourses (COWS) in England and Wales were being re-classified as main rivers. Powers to deal with them were being transferred to the Environment Agency as part of a Government initiative to improve watercourse maintenance and reduce flood risk.

Cabinet

6 APRIL 2005

The Cabinet considered an offer from the Southern region of the Environment Agency which would give the Council the opportunity to contract back maintenance of newly enmained COWS for a period of two years starting 2006. In addition members also considered the possibility of NFDC forming a partnership with Eastleigh Borough Council to carry out contracted back watercourse maintenance in their area, subject to a sound business case.