

SOUTH EAST PLAN; GOVERNMENT'S PROPOSED CHANGES

1. PURPOSE OF THIS REPORT

- 1.1 The Government has published the changes it proposes to make to the submitted South East Plan (submitted by SEERA in March 2006) following the Public Examination held from November 2006 to March 2007. A copy of the Government's Proposed Changes document, and a Companion Document incorporating the Proposed Changes, has been placed in the Members' Room. The documents can also be seen via: gose.limehouse.co.uk/portal. There is an opportunity to comment on the Government's Proposed Changes before 24 October. This report recommends a response to the Government from New Forest District Council. It takes into account the response from PUSH (Partnership for Urban South Hampshire), as considered at the PUSH Joint Committee on 16th September.

2. BACKGROUND

- 2.1 The South East Plan was initially prepared by SEERA (South East England Regional Assembly) but finally will be the Government's Plan for the region. It is an important document as it sets the long term spatial planning framework for the region. The South East Plan contains a strategy and associated policies for the whole region, and also more detailed strategies and policies for specific sub-regions. The South Hampshire (PUSH) area, which includes Totton and the Waterside is identified as a specific sub-region for growth and regeneration.
- 2.2 Local Development Frameworks (including New Forest District's Core Strategy, which is the subject of a separate item on this agenda) must be in general conformity with the regional plan. The South East Plan will form part of the statutory development plan, together with the Local Development Framework.
- 2.3 This Council took part in the Examination in Public (EiP) into the submitted South East Plan, and made representations based on the decisions made by Cabinet on 7 June 2006. In principle, this Council supported the strategy of the submitted South East Plan so far as it affects New Forest District and also endorsed the sub-regional strategy included for the PUSH area (Partnership for Urban South Hampshire). The representations made were based on this general support (in response to challenges from other parties) and on matters of detail.
- 2.4 The EiP Panel reported to the Government in August 2007. Some, but not all, of the Government's Proposed Changes reflect the EiP Panel's recommendations.
- 2.5 It is expected that the Government will publish the final South East Plan early next year.

3. THE GOVERNMENT'S PROPOSED CHANGES AND RECOMMENDED RESPONSE

3.1 The documentation relating to the Proposed Changes is very extensive, with the main document on Proposed Changes running to 532 sides. This report does not attempt to comment on all of the Proposed Changes, but rather highlights key matters on which Cabinet is advised to respond to the Government's consultation on Proposed Changes to the South East Plan, focusing on changes affecting New Forest District but also having regard to the joint response of the PUSH authorities.

(i) Housebuilding requirements

3.2 A key matter for the regional plan, and generally the most controversial issue, is the amount of new housebuilding. The Government proposes (Policy H1) to increase the amount of housebuilding in the region (from an annual average of 28,904 a year in the submitted Plan to an annual average of 33,125 a year). However, none of this proposed increase is in either New Forest District or the PUSH area. Cabinet is advised to support the endorsement of the submitted Plan's housing requirements for New Forest District and the PUSH area.

3.3 This Council supported the housing requirement for New Forest District (including the whole of the National Park area) of 4,140 additional dwellings 2006-2026 [an annual average of 207 dwellings]. From the joint work done with the National Park Authority on preparing Core Strategies, it was assumed that 220 of these additional dwellings would be in the National Park. The Government's Proposed Changes take these 220 dwellings out of the housing requirements for New Forest District Council's Core Strategy area (i.e. the District outside the National Park) and set a new requirement of 3,920 dwellings 2006-2026 for this area (Policy H1). This is effectively no change, in terms of the strategic requirement for Core Strategy preparation and can continue to be supported. The minimum provision made in the Council's proposed Core Strategy Submission Document (a separate item on this agenda) is consistent with this strategic requirement.

3.4 There is an important issue, however, arising from the statement in the Government's Proposed Changes that: "Local Planning Authorities will prepare plans, strategies and programmes to ensure the delivery of the **minimum annual average net additional dwelling requirements**" (Policy H1). There is concern that Planning Inspectors may treat this wording literally and look for the "minimum annual average requirements" (196 dwellings a year in the case of New Forest District outside the National Park) to be delivered each and every year. A recent letter from the Minister has clarified that this is not the case but the wording should be made more clear in Policy H1 of the South East Plan. It is also inappropriate to set the housing requirements as a "minimum" for every part of the region as this could undermine the "plan led system" and create uncertainty with regard to local planning, providing infrastructure and the effects on the local environment. Traditionally, housing requirements in strategic plans have never been regarded as ceilings if there are local circumstances to exceed them properly justified through the local plan (as allowed for in the New Forest District Core Strategy in response to the specific local issue of ensuring affordable housing provision), but to set them all as "minima" is a different matter. This Council agreed to the 80,000 dwellings proposed in the PUSH area 2006-2026 (Policy SH5) on the basis that this figure should not be increased or exceeded. It would be unacceptable to regard this as a minimum requirement. Cabinet is advised to object to this Proposed Change.

(ii) The Economy and Employment

- 3.5 The PUSH strategy proposals for 2 million sq. metres of additional business floorspace are endorsed in the Proposed Changes (Policy SH3). The South East Plan is not specific about employment requirements in the rest of New Forest District but the changes do not introduce any unacceptable requirements, except regarding one important issue. This concerns a statement the Government proposes to introduce (into Policy RE3) that: "In particular key sites of importance to the marine industry identified through SEEDA's Waterfront Strategies should be safeguarded in relevant Local Development Documents." SEEDA's Solent Waterfront Strategy, prepared by Adams Henry Consulting Ltd. (who represented ABP at the Dibden Bay Inquiry), lists "Dibden reclaim" as a "marine sector site of strategic economic significance". The submitted SE Plan made no such proposal and there was no testing of this matter, or related sustainability appraisal, in preparing the Government's Proposed Changes to the South East Plan. It is unacceptable for the SE Plan to cross-refer, via an untested document, to Dibden Bay as a marine sector site of strategic economic significance that should be safeguarded in Local Development Documents. Cabinet is advised to object to this Proposed Change.

(iii) Plan, Monitor, Manage and Infrastructure provision

- 3.6 The Government's Proposed Changes delete the policies on "Plan, Monitor, Manage" and the proposal that development must be conditional on infrastructure provision [Proposed Changes Chap 5. (21) and Chap 16. (7)]. This is of particular importance to areas where substantial new development is planned, including the PUSH area. While the proposed changes include a region-wide statement (Policy CC7) that: "Where new development creates a need for additional infrastructure a programme of delivery should be agreed before development begins", the overall effect of the proposed changes is to weaken the links between planned growth and proper infrastructure provision. In particular, it is an essential part of the PUSH strategy that housing growth is not being proposed for its own sake, but rather that it is related to economic growth and proper infrastructure provision. Cabinet is advised to endorse the PUSH objection to these Proposed Changes.

(iv) Green Infrastructure

- 3.7 The Government proposes to introduce a new policy (Policy CC8) requiring local authorities to work together to plan, provide and manage connected and substantial networks of accessible multi-functional green space. This is identified as being particularly important in areas close to sites of international ecological importance and in areas identified for significant growth. These green areas should be managed with the primary aim of maintaining and improving biodiversity. Cabinet is advised to support this new policy, which is already being addressed through joint work with the other PUSH authorities and the National Park.

(v) Environmental Sustainability

- 3.8 Cabinet is advised to endorse the PUSH objection to the proposed deletion of the South Hampshire specific Ecohomes/BREEAM building construction standards and renewable energy target and replacement by region-wide policies [Proposed Change Chap.16 (21)]. The PUSH policy was seeking to achieve the highest reasonable standards of sustainable development in recognition of the acknowledged biodiversity and environmental sensitivity of South Hampshire.

(vi) Green Belt

- 3.9 The areas south and west of the National Park in New Forest District are designated Green Belt and this is kept in the Government's Proposed Changes (Policy SP5). The Government proposes some reviews of the Green Belt in some parts of the region to meet regional development requirements, but not in New Forest District. The Proposed Changes do allow for smaller scale local reviews to be pursued through the Local Development Framework process. These reviews should look ahead to at least 2031. The proposed New Forest District Core Strategy (separate item on this agenda) reflects this approach.

(vii) Strategic Gaps

- 3.10 The Council's submissions supported the designation in the submitted South East Plan of the Southampton-Totton Strategic Gap, and also supported the references to the gaps between the Waterside settlements as possible Local Gaps. Subsequent Core Strategy work, in association with Southampton City Council and Test Valley Borough Council, has demonstrated that the Southampton-Totton gap is protected by other designations and consequently does not justify Strategic Gap designation. However, Strategic Gaps are important to the overall PUSH Strategy, in some places being essential to maintaining the protection of individual settlements. Cabinet is therefore advised to endorse the PUSH objection to the proposed deletion of the sub-regional gaps policy [Proposed Change Chap 16 (6)].
- 3.11 The South East Plan recognises, in the South Hampshire section (paragraph 16.6), that proposals for Local Gaps may be justified through Local Development Plan Documents, and this is the approach that is being pursued by this Council. However, the South East Plan should recognise that this situation can apply outside the South Hampshire area. We already have adopted Local Gaps in the north west of the District and there have been no changes in circumstances to affect this designation. Cabinet is therefore advised to request that the proposed statement regarding Local Gap designation be put as a region-wide statement rather than as only applying within South Hampshire.

(viii) The New Forest National Park

- 3.12 The Government proposes to add requirements to the New Forest National Park policy (Policy C1) that: "In considering proposals for development, the emphasis should be on small-scale proposals that are sustainably located and designed. Proposals which support the economies and social well being of the Park and its communities, including affordable housing schemes, will be encouraged provided that they do not conflict with the purposes for which the Park has been designated. Planning decisions should also have regard to the setting of the Park." Cabinet is advised to support this proposed change.

4. ENVIRONMENTAL IMPLICATIONS / EQUALITY AND DIVERSITY/CRIME AND DISORDER IMPLICATIONS

- 4.1 Environmental implications are integral to the comments made throughout this report. There are no specific Equality and Diversity or Crime and Disorder implications.

5. FINANCIAL IMPLICATIONS

- 5.1 None.

6. PORTFOLIO HOLDER COMMENTS

- 6.1 The Planning and Transportation Portfolio Holder supports the recommendations contained within all the sections of paragraph 3 above.

7. RECOMMENDATIONS

- 7.1 It is RECOMMENDED that Cabinet agrees that a response be submitted to the Government's consultation on Proposed Changes to the South East Plan based on the comments set out in section 3 above.

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Background Papers

Published reports
Letter from Ian Wright MP
to Moira Gibson 28/08/08