

## **PARTNERSHIP FOR SOUTH HAMPSHIRE STATEMENT OF COMMON GROUND**

### **1. RECOMMENDATIONS**

- 1.1 That the Cabinet supports the work to prepare a Statement of Common Ground for the strategic planning of southern Hampshire to replace the 2016 Position Statement, acknowledging the benefits and potential risk of participating in work being undertaken by officers as part of the Partnership for South Hampshire (PFSH).
- 1.2 That additional budget be identified to fund the Council's participation in the Partnership for South Hampshire to support the membership fee and the joint work on strategic planning matters.

### **2. INTRODUCTION**

- 2.1 The purpose of this report is to set out the context for this Council's participation in joint strategic planning work that is being undertaken through the Partnership for South Hampshire (previously the Partnership for Urban South Hampshire), and to explain the benefits and risks associated with this Council's involvement.

### **3. BACKGROUND**

- 3.1 The Partnership for Urban South Hampshire (PUSH) was originally established in 2003 as a non-statutory grouping of local authorities working together collaboratively towards "growing the south Hampshire economy". Membership of the partnership has varied with New Forest District Council participating in the work of PUSH for the majority of the time it has existed. (There was a period in which NFDC withdrew from membership). Until recently only the Totton and the Waterside part of New Forest District was within the area covered by PUSH. In October 2019 a revised Joint Agreement was approved, revising the geographic area covered by the partnership, extending coverage to the whole of New Forest District, including the New Forest National Park, and changing the name of the partnership to the 'Partnership for South Hampshire' (PFSH), in recognition that the area covered was no longer just the more urbanised parts of southern Hampshire.
- 3.2 The partnership has worked on a number of non-statutory strategic planning documents for the area it covers, with an aim of agreeing a strategic approach to planning within the sub-region. The importance of local planning authorities working together to agree strategic planning frameworks for wider areas than individual local planning authority areas is embedded in the National Planning Policy Framework (NPPF). Para.24 of the NPPF states:

"24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."

- 3.3 And para.26 states:

"26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot

be met wholly within a particular plan area could be met elsewhere.”

- 3.4 The south Hampshire partnership has produced a number of non-statutory documents to assist in planning and developing a vision for the area and help co-ordinate the preparation of individual local planning authorities' statutory development plan documents. Most recently a 'Spatial Position Statement' was completed in 2016, supported by wide ranging evidence-base. It set out the overall need for development to 2034 and proposes development targets for each Council. It has helped Councils meet their duty to co-operate but with the changes to the way housing need to be calculated this document can no longer be relied on. It replaced the earlier South Hampshire Strategy (2012) which looked to 2026. (Other joint work in the planning and infrastructure field has included producing a South Hampshire Green Infrastructure Strategy and Implementation Plan.)
- 3.5 In preparing our Local Plan Review, this Council has had regard to the housing targets for the Totton and Waterside area set out in the 'Spatial Position Statement' of 2016. It is no coincidence that the housing targets set out in that document aligned with the provision for new development in Totton and the Waterside that we were able to make in our adopted Local Plan Review Part 1. Your officers have been actively involved in the technical work undertaken on behalf of the partnership to ensure consistency with the detailed work we have undertaken for our own plan area.
- 3.6 By participating in PfSH, the Council fulfils its duty to co-operate with neighbouring authorities in southern Hampshire and ensures that the Council has a say in sub-regional planning for the area, particularly on cross-boundary issues, such as strategic infrastructure provision. It also provides an evidence base for future plan making.

#### **4. FUTURE WORK OF PfSH AND THE IMPLICATIONS FOR NEW FOREST DISTRICT**

- 4.1 As of 6<sup>th</sup> July 2020 we have an adopted Local Plan setting out our planning strategy for the district (outside the National Park) up to 2036. The New Forest National Park Authority also has an adopted Local Plan covering the same period. No other local planning authorities in southern Hampshire has an up-to-date adopted Local Plan covering the period to 2036.
- 4.2 Following the publication of the National Planning Policy Framework (NPPF) in 2018 and the changes to the way housing numbers are now calculated PfSH Joint Committee, a Committee made up of the Leader/Portfolio Holder and Chief Executive of each of the Partner authorities, agreed that the PfSH authorities could no longer rely on the Position Statement as being sufficient for each authority to meet their statutory Duty to Co-operate. With the revised NPPF requiring an authority's Local Plan to be based on effective joint working on cross boundary strategic matters that have been dealt with by a Statement of Common Ground work is now progressing on preparing the evidence base for a new Statement of Common Ground up to 2036.
- 4.3 This Council's and the National Park Authorities' now adopted Local Plans were prepared using the approach set out in the NPPF 2012. (This was acceptable – the plans are regarded as 'transition plans' commenced before changes to the NPPF in 2018.) This Council's Local Plan has addressed in full the housing need in its area as calculated using the approach required by NPPF 2012. This approach involved detailed studies undertaken in 2017 and up-dated in 2019 to produce a realistic assessment of objectively assessed needs within New Forest District, taking into account the most up to date data available. The Local Plan inspectors' report states:

“...we consider that the 2017 OAN Study was justified in moving away from the 2014 based SNHP to establish an alternative demographic starting point for the assessment of OAN based on the ten-year trend scenario. This would still see

significant population growth and net migration in the combined New Forest District area. Furthermore, we are satisfied that the 2019 OAN Update Report demonstrates that the 2017 OAN Study remains an appropriate basis to determine OAN for the New Forest District Council planning authority area.”

- 4.4 However, plans now being prepared will need to use a revised standardised approach to the assessment of ‘housing need’<sup>1</sup>. The effect of applying the current standardised approach is to significantly increase the estimates of housing ‘need’ for this area (and in the PfSH area in general). Therefore, as a starting point, the new PfSH strategic planning work will need to consider higher levels of housing building in the area than it did in the previous 2016 Position Statement – including for New Forest District.
- 4.5 To illustrate the issue with regard this district, the two adopted Local Plans covering New Forest District in combination plan to provide an average of 521 dwelling per year in the period to 2036. Under the Governments standard method of calculating housing ‘need’, this figure would increase significantly (by around 40%)<sup>2</sup>. Any review of the planning strategy of this area would be expected to be in the context of the revised standard way of calculating ‘objectively assessed need’. Future plans, including the work of PfSH, will need to consider how that unmet housing need will be addressed.
- 4.6 Technical work for the SOCG has commenced. This includes identifying potential ‘Strategic Development Opportunity Areas’ (SDOAs) for assessment. Areas within New Forest District, which we have already assessed and ruled out, will need to be considered once more, alongside similar opportunity areas across southern Hampshire.

## **5. BENEFITS AND RISKS**

### **5.1 The benefits of participating in the PfSH strategic planning work**

- 5.2 Participation in the strategic planning work for south Hampshire through PfSH, provides an opportunity to take a wider strategic look for the most appropriate and sustainable locations to accommodate growth in south Hampshire. The joint work on where development should take place means that locational decisions are not unnecessarily dictated by local authority administrative boundaries. The joint working provides the opportunity for more positive planning of the area. An agreed strategy could seek to redirect unmet needs arising from an area to less environmentally sensitive locations or to locations where greater economic benefits would arise. It could resolve the question of where any ‘unmet’ housing need arising from this area can best be addressed.
- 5.3 Participation in the work to agree a Statement of Common Ground (SoCG) between the PfSH planning authorities shows that NFDC has worked co-operatively with other planning authorities and addressed the NPPF’s ‘duty to co-operate’ requirement. This is an important consideration for a Local Plan when it is examined following submission to the Secretary of State. During the Local Plan examination the Inspector asked NFDC officers to demonstrate how they were now working with adjoining authorities under the Duty to Co-operate, officers were able to describe the work that is underway through PfSH. Failure to meet this duty can result in a plan being found ‘unsound’. (There are examples of this nationally.)

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<sup>1</sup> This is a numerical calculation which is based on 2014 forecasts of population change, rates of household formation, and migration assumptions, together with affordability ratios from nationally published data sources.

<sup>2</sup> A revised ‘standard methodology’ for calculating ‘housing need’ is likely to be put in place by the Government in the next few months which will further increase ‘requirements’.

5.4 *The recently published consultation paper on major reforms of the English Planning System 'Planning for the Future'<sup>3</sup> set out the intention to put in place 'binding' requirement for planning authorities to meet the housing needs (as calculated by a set Government formula, designed to increase supply). The only way for planning authorities to agree an alternative strategic distribution of the requirement will be in the context of joint planning arrangements.*

## 5.5 **The risks from participating in the PfSH strategic planning work**

5.6 Unlike most other local planning authorities in south Hampshire, NFDC has an up-to-date adopted Local Plan, tested through the Examination process, covering the period to 2036. Future reviews of that Plan and its strategy will have to be done in the context of the relevant Government method of assessing housing need at that time. Any review of the district's recently adopted Local Plan will re-open questions about the appropriate level of housing being planned for in the district. There is likely to put pressure to plan for much higher levels of development than in the recently adopted Local Plan because of the Government's approach to assessing that need. While the joint work of the partnership provides an opportunity to address where any unmet housing needs arising from southern Hampshire cities and districts should be accommodated, there is a risk that the necessary agreement will not be reached, or that what is agreed by other parties is not acceptable to this Council. This is a risk for all authorities that are party to the work. From previous work, this Council is already aware of the inability or unwillingness of neighbouring planning authorities to assist this Council in accommodating housing needs that cannot be met within our planning area. (This was explored as part of work on the Local Plan Review Part One and led to the need to release land from the Green Belt within the District.)

5.7 There is a risk that the work of PfSH could put pressure on this area to undertake an early review of the Local Plan and to accommodate higher levels of housing, beyond the numbers now agreed in our recently adopted Local Plan. It could result in the need to allocate further land for development within the area, land which the Council itself has already rejected as suitable sites for development. Whilst this is a risk for this authority it is a risk for all participating authorities.

5.8 A risk of not participating in the PfSH work is that the duty to co-operate will be more difficult to fulfil, will not be fulfilled when the Council next reviews the Local Plan.

## 6. **CONCLUSIONS**

6.1 There are both benefits and some risk involved in participating in the preparation of the PfSH Statement of Common Ground. While early work being undertaken is of a technical nature, the agreement (or otherwise) of a Statement of Common Ground will be for the political decision-makers. To ensure the outcome of this work is acceptable of this Authority it is important that Members as well as your officers are fully engaged with and understand the potential implications of this work.

6.2 The risks of not being part of the joint spatial planning work of the Partnership for South Hampshire are significantly greater than those associated with continuing as part of the partnership. Active engagement of this Council (Members and officers) in this work will be important if positive outcomes are to be achieved.

## 7. **FINANCIAL IMPLICATIONS**

7.1 A budget already exists for PfSH membership. Additional budget needs to be set aside to fund full participation in the work of PfSH and its activities.

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<sup>3</sup> To be subject to a separate report.

7.2 Every effort will be made to offset the additional budget requirement of up to £50,000 within the Portfolio, but ultimately any additional budget requirement will be fed into the Council's Medium Term Financial Planning.

## **8. CRIME & DISORDER IMPLICATIONS**

8.1 There are none.

## **9. ENVIRONMENTAL IMPLICATIONS**

9.1 Potentially very significant environmental impacts across the district.

## **10. EQUALITY & DIVERSITY IMPLICATIONS**

10.1 There are none.

## **11. DATA PROTECTION IMPLICATIONS**

11.1 There are none.

## **12. PORTFOLIO HOLDER COMMENTS**

12.1 For the reasons set out within the report, and recognising that there are potential risks from engaging in this partnership working with fellow PfSH Authorities, but that these are outweighed by the potential benefits to our District and our residents from a wider strategic approach to spatial planning policy within the South Hampshire area, I support the recommendations.

### **For further information contact:**

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### **Background Papers:**

Published documents