

NFDC RESPONSE TO THE BCP REGULATION 19 DRAFT LOCAL PLAN CONSULTATION

Strategic Policy H1: Housing delivery

NFDC recognises that BCP is a constrained area, with geographical constraints and numerous national and international designations, and also recognises the challenge BCP faces in terms of meeting housing needs. The BCP Local Plan (in Policy S2: Spatial Strategy and levels of growth and Policy H1: Housing delivery) sets a housing requirement to deliver at least 24,000 net additional new dwellings between 2024 and 2039. This is equivalent to the delivery of an average of 1,600 new dwellings each year. Using the Government's standard method for calculating housing need, there is a housing need in the BCP area of 2,806 dwellings per annum. NFDC notes that BCP Council has made the decision not to propose site allocations in the Green Belt in seeking to address their objectively assessed housing need. Against the standard method, there will be a shortfall of circa. 1,200 dwellings per annum equating to a shortfall over the whole Plan period 2024-2039 of circa. 18,000 dwellings. The scale of this shortfall is very significant and has the potential to place further increased pressures on surrounding areas to help address the shortfall.

The NFDC Local Plan Area is very highly constrained and the part of the Plan Area that adjoins BCP is also within the Green Belt. The December 2023 published PfSH (Partnership for South Hampshire) Spatial Position Statement¹ indicates a significant current housing supply shortfall in the PfSH area of circa. 11,770 dwellings, of which there is a housing supply shortfall, based on existing commitments, for NFDC against the standard method of circa. 5,650 dwellings in the period to 2036. It is in this context that NFDC has recently commenced a full Local Plan Review. At this stage of preparation, the extent to which the Local Plan Review will be able to meet future housing needs is not clear, particularly when considering the need for any such Plan to cover a minimum 15-year period from its adoption.

Paragraphs 11.20 of the Local Plan indicates that BCP Council will regularly monitor the policies in this Plan to assess whether they are working effectively and sets out a range of actions that BCP Council will take where Local Plan targets are not being met which may include a partial/full review of the Local Plan. Paragraph 11.21 confirms that BCP Council will review the BCP Local Plan by 2030 to ensure that the overall strategy remains up to date. Given the matters raised regarding housing need and the housing target, and the challenges that both BCP Council and NFDC face regarding addressing housing need, NFDC considers that paragraphs 11.20 and 11.21 should be strengthened and elevated to policy status. Such a policy should also require BCP Council to specifically consider the need to commence a review of its Local Plan if a quantified unmet need is established and confirmed through the New Forest District (outside the National Park) Local Plan Review. This will ensure that appropriate mechanisms are provided for within the Local Plan to enable BCP Council to respond positively to considering how unmet needs should be addressed.

NFDC notes with interest that BCP Council has undertaken and published as part of its evidence base a Housing Needs Sensitivity report (2021) which concluded a lower housing need compared to the standard method across the BCP area of 1,600 dwellings per annum. It is not currently clear whether BCP Council will use this report to formally challenge the need figure calculated by the standard method at their Local Plan examination. NFDC will be

¹ <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/>

interested in the progression of this matter through the BCP Local Plan examination and will be interested in the outcome that is reached.

Policy E2: Employment supply

The Employment Land Study (2023) informing the BCP Local Plan identifies a need of between 66.4 and 97.4 hectares of employment land over the period 2021 to 2039. The study recommends a target within a range of 66.4 to 97.4ha. The BCP Local Plan (Figure 9.1) identifies a supply of 79 to 92 hectares of available employment land over the period 2021-2039. Policy E2: Employment supply makes provision for around 72ha of employment land over the Local Plan period 2024-2039. This would appear to address the quantitative need for employment land identified by the 2023 Employment Land Study and NFDC welcomes that BCP Council is planning to meet this need in full within its Plan Area.

Strategic Policy T1: Transport Strategy

This policy's aim of reducing carbon emissions and congestion, support health, and the safe and efficient movement of people and goods, is supported. Of particular relevance to NFDC is point 'j': *"supporting the delivery of infrastructure identified through the Sub-national Transport Body, Local Transport Plan, Local Cycling and Walking Infrastructure Plan and Bus Service Improvement Plan;"*

We welcome continued engagement on such proposals as they progress that adjoin or relate to NFDC's own Plan Area, to ensure there is good connectivity and routes that join up between respective settlements. This includes the primary and secondary cycle network shown in the Local Cycling & Walking Infrastructure Plan (LCWIP), for which NFDC are preparing their own 'New Forest LCWIP'.

Policy NE2:

Habitats sites and wildlife sites

The section on Protecting habitats sites is detailed and is welcomed. The paragraphs relating specifically to New Forest habitats (paragraphs 6.30-6.32) provide an accurate commentary on the situation in relation to the zone of influence. The reference to SAMMs payments from developers is also welcomed. NFDC is satisfied that the requisite work is being carried out and providing the cross-boundary work continues is content with the approach set out in the Local Plan.

Policy NE2 is positive and sets out firstly a clear need for mitigation, and details the appropriate mechanisms being used to identify measures to avoid or mitigate adverse impacts on New Forest designated sites. Section 4 of the policy also provides helpful clarification, and the associated Policies Map sets out clear mapping / zone for developers to know whether their site is affected by this policy. Under Infrastructure needs (paragraph 4.16) BCP commits to working with neighbouring councils to develop and deliver strategic mitigation measures in relation to visitor pressure on protected habitats. NFDC reiterates that it will be happy to continue with and expand upon cross boundary working on this issue.

Air Quality

Paragraphs 6.13 - 6.16 explain the situation sufficiently, but NFDC questions why Natural England is not requiring BCP to undertake specific air quality and habitat monitoring like that which NFDC has put in place? Taking the Strategic Transport Assessment as the basis for gauging impacts on the integrity of the Dorset heathlands is deemed by NFDC to be possibly insufficient – the modelling of vehicle movement data will not tell us whether vehicle emissions are directly having an adverse effect on the protected habitats.

APPENDIX 1

The Dorset Heaths Air Quality Interim Strategy suggests that a monitoring programme will be implemented. NFDC offers to work with BCP to share data on what NFDC is doing so that BCP has a starting point which is consistent with what other local planning authorities are doing. The habitats are similar so it would be logical to assess look at what NFDC/NPA are doing and replicate it across the border especially as Natural England has had full involvement in agreeing the monitoring methodology with NFDC. Policy NE2 5a sets out that BCP will work with neighbouring councils to ensure mitigation measures are implemented and monitored – NFDC offers particular support to this and reiterates its willingness to engage with BCP further on this.

Water Quality (Nitrates)

The paragraphs relating to raised levels of phosphates in the River Avon (paragraphs 6.27-6.28) are an accurate commentary about the issue. This section will need to be updated once the secondary legislation in April (2024) provides clarity on whether the Christchurch treatment works are named in the latest nutrient calculator updates/guidance. Section 5 of Policy NE2 gives clear criteria (5a) that dwelling occupation cannot take place until nutrient mitigation is in place, and this is consistent with the approach that the legislation requires and the practice of other local authorities.