

RESPONSE TO NEW FOREST NATIONAL PARK LOCAL PLAN CONSULTATION DRAFT (OCTOBER 2016)

1. PURPOSE OF REPORT

- 1.1 To agree the Council's response to the New Forest National Park Local Plan review consultation draft closing 28 November 2016.

2. BACKGROUND

- 2.1 The New Forest National Park Authority (NFNPA) is consulting on the scope and content of its Local Plan Review which will replace its Core Strategy and Development Management Policies DPD adopted in 2010. The review process started in summer 2015 and included a formal public consultation on the main issues to be addressed through the new Local Plan. A consultation is underway seeking views on key issues, draft policies and proposed allocation sites. This council is working closely with National Park officers on cross boundary issues and has also commissioned a number of joint studies with the NPA as part of our respective evidence base work.

3. PROPOSED RESPONSE

- 3.1 The draft Local Plan identifies the key issues, and how the draft plan relates to the areas outside the National Park. To this end it sets out that the two main areas of strategic cross-boundary planning interest are Habitat Protection and Housing provision. It is agreed that these are the key challenges facing both authorities.
- 3.2 **Habitat protection:** the Local Plan review seeks to address the recreational impacts that residential development in the New Forest will have on the New Forest SPA/SAC and how this can be appropriately mitigated to avoid adverse impacts on the European Nature Conservation Designations. NFDC will continue to work with the NPA to identify and address recreational impacts on the New Forest arising from new development in a proportionate and consistent manner.
- 3.3 **Housing provision:** This council has jointly commissioned a Strategic Housing Market Assessment (SHMA) with the NPA and there is limited capacity within the National Park to absorb a significant increase in development. The NPA provides interim positions on housing, the duty to cooperate and it's Sustainability Appraisal. We have already agreed that supplementary work will be needed to identify housing need and establish the most appropriate levels of growth for the wider New Forest area.
- 3.4 **Major sites affecting both councils:** the NPA sets out the current planning policy for the Fawley Power Station site, and the land at Dibden Bay. These are potentially significant sites for future development and the NPA provides an accurate reflection of what will need to be considered at those sites.

5. ENVIRONMENTAL IMPLICATIONS

- 5.1 The potential environmental impact of the National Park Local Plan, especially on the New Forest SPA and SAC, which is being addressed through joint working with the National Park Authority.

6. FINANCIAL, EQUALITY & DIVERSITY and CRIME & DISORDER IMPLICATIONS

6.1 None

7. RECOMMENDATIONS

7.1 To agree the consultation response attached as Appendix 1.

8. PORTFOLIO HOLDER DECISION

I have agreed to the recommendations of this report.

Signed: CLLR EDWARD HERON

Date: 21 NOVEMBER 2016

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Background Papers:

Published documents¹

Date on which notice given of this Decision – 22 November 2016

Last date for call-in - 29 November 2016

¹ New Forest National Park Local Plan Review consultation draft (October 2016)
http://www.newforestnpa.gov.uk/downloads/file/1459/local_plan_consultation_draft_october_2016

NOVEMBER 2016

NEW FOREST NATIONAL PARK AUTHORITY – CONSULTATION ON LOCAL PLAN REVIEW OCTOBER 2016

The New Forest National Park Authority (NFNPA) is consulting on a draft Local Plan to replace its Core Strategy and Development Management Policies DPD adopted in 2010. This is informal consultation under Regulation 18 Of the Town And Country Planning (Local Planning) (England) Regulations 2012.

New Forest District Council welcomes the publication of the [NFNPA Consultation Draft](#) and the broad alignment of timetables for the production of the Local Plans.

NFNPA and New Forest District Council (NFDC) continue to liaise closely on cross boundary issues such as housing need, habitat mitigation and assessing flood risk. The joint commissioning of evidence base and regular officer and member level liaison meetings will ensure that planning for the two plan areas is closely aligned. To this effect, the Interim Duty to Cooperate Statement (October 2016) is agreed to be a fair reflection of cooperative working to date.

We agree that the two main areas of wider strategic cross-boundary planning interest (Habitat Protection and Housing provision - Paragraph 1.15) are an accurate reflection of the key strategic challenges facing both authorities.

Habitat protection

We have a shared interest and responsibility to avoid or where necessary mitigate (preferably at source) the recreational and other impacts of growth on Natura 2000 sites such as the New Forest National Park SPA and SAC in a consistent and proportionate way, including by provision of green infrastructure and alternative recreational green space. We have agreed to discuss any cross boundary opportunities for habitat impact mitigation.

NFDC fully recognises that “*The New Forest National Park has a higher proportion of its land covered by (these) international nature conservation designations than any other planning authority in England, including all other English National Parks*” (Paragraph 5.5). We agree that Policy 4 Nature Conservation Sites of International Importance, including the caveats to the two criteria, provides an appropriate framework for dealing with the development pressures that bear upon the area. The jointly commissioned work being undertaken on a Habitat Regulations Assessment (HRA) will form part of the evidence base with regard to determining whether the Local Plan proposals and policies are likely to adversely affect the integrity of any European site.

Policy 8 Green Infrastructure strikes an appropriate balance between seeking opportunities to create and/or enhance connectivity and relieve recreational pressures on internationally important nature conservation sites. NFDC supports the statement that providing a new Suitable Alternative Natural Greenspace (SANG) in the National Park as mitigation for development outside the National Park is generally not appropriate, unless there is a strong functional relationship between the land areas in question and it could provide a genuine and locally walkable alternative to trips by car for recreation and dog walking in more sensitive habitat areas.

Housing provision

We acknowledge that there are likely to be constraints on the capacity within the National Park to sustainably absorb a significant increase in housing development, as there are in the

surrounding District. We also acknowledge that there are important planning reasons why a constraint-based approach may well be appropriate in the National Park. Nevertheless it is not immediately apparent from either the draft local plan or the accompanying Sustainability Appraisal report what if any alternative options the Park Authority has considered - and tested - in relation to both its spatial strategy (policy 3) and its policy for new residential development including the 700 home proposed target (policy 18). Nor is it clear on what evidence 700 homes is considered to be the sustainable limit, or whether the Authority has looked beyond the SHLAA and call for sites responses for other potentially sustainable housing development opportunities. For example whether other spatial strategies were considered such as defining settlement boundaries for other relatively large villages to enable some limited infill within them, or whether the Authority has investigated opportunities on land in the vicinity of the former Fawley power station brown field site that could be bought forward in a manner that satisfies the proposed strategic policies on a cross-boundary basis.

We also take this opportunity to formally notify the NFNPA that this district also appears unlikely to be able to meet its housing needs in full at this stage. If that remains the case the Park Authority and the District Council would both need to engage with other neighbouring areas to explore where any shortfall might be made up under the formal Duty to Cooperate.

NFDC and the National Park Authority will be jointly commissioning supplementary updating to our 2014 SHMA. Part of this work will seek to more clearly identify how our housing needs correspond to the three housing market areas that the district and the National Park form a part of. We will continue to work with the National Park Authority to establish the most appropriate levels of growth for the wider New Forest area.

Transport and other infrastructure

NFDC duly notes the concerns in Paragraph 9.13 relating to the impact of increased trip generation on the National Park arising from development outside the National Park boundary. We will continue our joint working with NFNPA to discuss feedback from infrastructure providers and to better understand the cumulative implications of growth proposals for our respective local plans.

Policy 7: 'Safeguarding and Improving Water Resources' could usefully make reference to the EA Groundwater Source Protection Zones in relation to identifying areas at particular risk of harm to the quality of groundwater. The implications of the Water Framework Directive may also be a plan review issue in relation to the Avon and Solent.

Other policies

Policy 11 (Flooding and the Coast) as currently titled Policy 11 gives the impression that flooding is related primarily to the coast. To aid clarity for the reader, Policy 11 could be renamed "Policy 11: Flood Risk" to better reflect the risk from a variety of sources in the New Forest area, informed by our joint SFRA in progress. The policy should also cover surface water flood risk.